

Exhibit 1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

JOSEPH DEMAURO,)	
)	
Plaintiff,)	
v.)	No. 98 C 8318
)	Judge Gottschall
BETTY LOREN-MALTESE and TOWN OF CICERO,)	
)	
Defendants.)	

**PLAINTIFF'S LOCAL RULE 54.3(e) STATEMENT
REGARDING ATTORNEYS' FEES AND RELATED NONTAXABLE EXPENSES**

Plaintiff JOSEPH DEMAURO ("DeMauro") by his respective attorneys and pursuant to Local Rule 54.3(e), submit the following Statement Regarding Attorneys' Fees and Related Nontaxable Expenses sought by DeMauro through January 31, 2007.¹ Attached hereto and incorporated herein by reference are the time and expense records of Hughes Socol Piers Resnick & Dym, Ltd. for this case, which show the time, tasks and expenses for which compensation is sought, as well as the affidavits of Terence J. Moran and Judson H. Miner, to support the hourly billing rates sought by DeMauro.

1. As set forth in the attached time and expense records, DeMauro claims fees (for attorneys and paralegals) in the total amount of \$412,388.00, and nontaxable expenses in the amount of \$3,944.22. DeMauro's separately filed Bill of Costs was for \$8,781.47. The fee request is based on the "lodestar" method as follows:

Terence J. Moran	897.9 hours at \$360 per hour:	\$323,244.00
Peter C. McLeod	442.9 hours at \$190 per hour:	84,151.00
Juliet Berger-White	6.7 hours at \$220 per hour:	1,474.00
Alex Montgomery	5.7 hours at \$190 per hour:	1,083.00
Matthew J. Piers	1.9 hours at \$400 per hour:	760.00
Alison Margolies	1.2 hours at \$205 per hour:	246.00
Arianna Cisneros	10.2 hours at \$65 per hour:	663.00
Matthew Montalvo	4.8 hours at \$65 per hour:	312.00
John DeLaGrange	3.5 hours at \$65 per hour:	227.50

¹ DeMauro reserves the right to seek an award of additional fees and expenses incurred thereafter, and will do so after the Court rules on the parties' pending post-trial motions.

EXHIBIT

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tabbles

Aaron Brown	2.0 hours at \$65 per hour:	130.00
Christina Jackiw	0.7 hours at \$65 per hour:	45.50
Marci Sahinoglu	0.4 hours at \$65 per hour:	26.00
Mack Fisher	0.4 hours at \$65 per hour:	<u>26.00</u>
		\$412,388.00

Defendants incurred fees, costs and expenses totaling at least \$612,439.02, through November 8, 2006.

2. The total amount of fees that Defendants deem should be awarded is \$75,000. The total amount of costs and nontaxable expenses Defendants deem should be awarded is \$10,000. [Local Rule 54.3(e)(2) requires defendant Town of Cicero (“the Town”) to provide a table giving the Town’s position as to the compensable hours, appropriate rates and total for each biller listed above. The Town, however, has refused to tender such a table to DeMauro.]

3. DeMauro cannot describe the specific disputes remaining between the parties because the Town has refused to comply with its obligations under Local Rule 54.3(1) to “attempt in good faith to agree on the amount of fees or related nontaxable expenses that should be awarded” and (2) to “specifically identify all hours, billing rates, and related nontaxable expenses (if any) that will or will not be objected to, the basis of any objections, and the specific hours, billing rates, and related nontaxable expenses that in [the Town’s view] are reasonable and should be compensated.” L.R. 54.3(d). See Plaintiff’s fee motion.

4.(A). DeMauro’s motion for an award of fees and expenses is based upon the judgment entered in his favor of December 5, 2006, which establishes DeMauro as “the prevailing party” for purposes of 42 U.S.C. § 1988. That judgment may be altered and/or amended pursuant to the parties’ post-trial motions.

4.(B). [Local Rule 54.(e)(4)(B) requires the Town to state whether it intends to appeal that judgment, but the Town has failed to provide that information to DeMauro.]

Respectfully submitted,

s/ Terence J. Moran

Terence J. Moran, Esq.
Hughes Socol Piers Resnick & Dym, Ltd.
70 West Madison, Suite 4000
Chicago, Illinois 60602
Attorneys for Plaintiff Joseph DeMauro

Feb 26, 2007

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JOSEPH DEMAURO
 1210 S. AUSTIN BLVD., APT.7
 CICERO, IL 60804

Client No.: 0101387
 Matter No.: 138710534 TOWN OF CICERO

For Legal Services and Disbursements
 For the Period Ending Jan 31, 2007

		Hours

12/11/98 TJM	Begin drafting complaint	1.20
12/17/98 TJM	Continue drafting federal complaint	3.50
12/18/98 TJM	Continue drafting complaint	2.00
12/21/98 TJM	Revise complaint	.50
12/22/98 TJM	Revise complaint; telephone conference with Mr. DeMauro; legal research regarding federal jurisdiction over administrative review claim; review background material on defendants	2.20
12/23/98 TJM	Continue work on complaint; prepare related documents	1.30
12/29/98 TJM	Telephone conference with process server regarding status of service on defendants; letter to Mr. DeMauro	.20
01/12/99 TJM	Telephone mail messages from/to Mr. Prossnitz regarding DeMauro federal case; telephone conference with Mr. Prossnitz regarding same	.30
01/16/99 TJM	Telephone mail messages to/from Mr. Kimbarovsky	.20
02/01/99 TJM	Review proofs of service and appearances and otherwise prepare for 2-2-99 status	.50

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02/02/99	TJM	Court appearance; conference with Messrs. Ficaro, Bregenzer and Kopecky; review fax from Mr. Kopecky; telephone mail message from and telephone conference with Mr. Kopecky; draft motion for reassignment	2.20
02/04/99	TJM	Review court order; revise motion to reassign; arrange for filing/serving of same	.80
02/10/99	TJM	Court appearance on motion to reassign; conference with defense counsel; telephone mail message to Mr. Piers	.80
02/12/99	TJM	Review Town and Police Board motions to dismiss	.80
02/22/99	MJP	Conference with Mr. Moran re: reassignment of DeMauro	.30
02/22/99	TJM	Review/analyze motions to dismiss DeMauro; review Mr. Piers' 2/15 and 2/19 memoranda; conference with Mr. Piers; telephone conference with Judge Conlon's secretary; telephone mail messages to/from Judge Conlon's clerk	2.50
02/23/99	TJM	Legal research regarding Rayle motion to dismiss	1.20
03/01/99	TJM	Telephone mail message from and telephone conference with Mr. DeMauro; conferences with Mr. Piers; legal research regarding motions to dismiss	1.60
03/02/99	TJM	Legal research regarding motions to dismiss; conference with Mr. Piers; telephone mail message to Mr. Kopecky; begin drafting response to Loren-Maltese motion to dismiss	5.30
03/03/99	TJM	Continued work on response to Loren-Maltese motion to dismiss; related legal research; draft response to Town defendants' motion to dismiss; related legal research	5.40

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03/04/99 TJM	Revise responses to Loren-Maltese and Town defendants' motion to dismiss; begin drafting response to Rayle motion to dismiss; related legal research	5.20
03/05/99 TJM	Complete responses to Loren-Maltese and Town defendants' motion to dismiss; begin drafting responses to Police Board and Rayle motions to dismiss; related legal research	5.50
03/07/99 TJM	Continue work on response to Rayle motion to dismiss	.90
03/08/99 TJM	Final revisions to response to Rayle motion to dismiss; related legal research; begin response to Police board motion to dismiss	3.50
03/09/99 MJP	Review response to Rayle Motion to Dismiss	.30
03/09/99 TJM	Draft response to Police Board motion to dismiss; related legal research	2.50
03/10/99 TJM	Continue work on response to Police Board motion to dismiss; related legal research	3.50
03/11/99 TJM	Complete response to Police Board motion to dismiss; related legal research	4.00
03/15/99 TJM	Telephone conference with Mr. DeMauro; organize pleadings	.50
03/17/99 TJM	Telephone mail messages from and telephone conference with Mr. DeMauro re: his arrest; telephone conference with Ms. Kaveny	.70
03/19/99 TJM	Conference with Mr. Piers regarding 3-17 arrest of Mr. DeMauro; telephone mail message from Ms. Kaveny	.40
03/23/99 TJM	Review/analyze reply briefs of Loren-Maltese and Police Board	.50
03/29/99 TJM	Review Rutka/Guido reply brief	.40

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04/15/99	TJM	Review/analyze Rayle reply; telephone conference with and telephone mail messages to/from Mr. DeMauro	.80
07/22/99	TJM	Review Rayle discovery requests	.30
07/23/99	TJM	Letter to Mr. DeMauro	.20
07/27/99	MJP	Review Rayle discovery	.20
08/05/99	TJM	Review documents provided by Mr. DeMauro	.50
08/13/99	TJM	Begin preparing responses to Rayle discovery requests	1.00
10/05/99	TJM	Review/analyze list of deponents provided by Mr. DeMauro; telephone mail messages from/to Mr. DeMauro	.30
10/06/99	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.30
11/19/99	TJM	Telephone conference with Mr. DeMauro; telephone conference with Ms. Kaveny; begin drafting responses to Rayle discovery requests	.80
11/22/99	TJM	Prepare for November 23, 1999 court appearance; telephone mail message to Mr. Kimbarovsky	.30
11/23/99	TJM	Court appearance; conference with Messrs. Kunkle, Kimbarovsky and Bregenzer	1.50
11/30/99	TJM	Telephone mail messages from/to Mr. Garippo regarding defendant Rutka	.70
12/01/99	TJM	Telephone mail messages to/from Ms. Kaveny	.20
12/06/99	TJM	Discovery scheduling conference with Ms. Kaveny and Messrs. Kimbarovsky and Bregenzer	.50
12/06/99	TJM	Review letter from Mr. Kimbarovsky	.20

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12/20/99	TJM	Prepare proposed discovery schedule and otherwise prepare for December 4 court appearance	.50
12/21/99	TJM	Court appearance; conference with defense counsel; conference with Mr. DeMauro	1.50
12/28/99	TJM	Telephone mail message to Ms. Kaveny re: Mr. Rutka	.20
01/26/00	MJP	Review ruling on motion to dismiss; conference with Mr. Moran	.50
01/26/00	TJM	Review/analyze January 20, 2000 memorandum opinion re: motions to dismiss; conference with Mr. Piers re: same	.50
03/28/00	TJM	Court appearance; conference with Demauro	1.30
04/03/00	TJM	Review letter from Mr. Bregenzer	.20
04/06/00	TJM	Letter to defense counsel; begin drafting responses to Rayle discovery	3.00
04/10/00	TJM	Continued work on responses to Rayle discovery	1.60
04/11/00	TJM	Continued work on responses to Rayle discovery	2.20
04/12/00	TJM	Telephone mail message from/to and telephone conference with Mr. Demauro; telephone messages to/from and telephone conference with Mr. Bregenzer; continued work on responses to Rayle discovery	1.80
04/14/00	TJM	Review/analyze Rayle answer; telephone mail message from and telephone conference with Mr. Kimbarovsky	.50
04/21/00	TJM	Conference with Mr. DeMauro re: Rayle discovery responses; continued work on same	2.30
04/24/00	TJM	Continued work on response to Rayle discovery	.50
05/08/00	TJM	Continued work on responses to Rayle discovery	.50

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05/23/00	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
06/12/00	TJM	Arrange for service of Cyrluk subpoena; legal research re: fee for same	.20
06/13/00	TJM	Telephone mail messages from/to and telephone conference with Mr. Cyrluk re: Rayle subpoena; telephone mail message from Mr. Torshen	.30
06/15/00	TJM	Telephone conference with Mr. Kimbarovsky	.20
06/16/00	TJM	Review Rayle motion to quash portion of subpoena	.20
06/21/00	TJM	Conference with Messrs. Ficaro, Kunkle and Kimbarovsky; prepare for June 22 court appearance	.30
06/22/00	TJM	Telephone mail messages from/to and telephone conference with Mr. Cyrluk re: Rayle subpoena; prepare to argue against motion to quash same	.70
06/23/00	TJM	Conference with defense counsel; court appearance; conference with Mr. DeMauro	1.50
07/17/00	TJM	Review/analyze defendants' answers; telephone conference with Mr. Demauro re: same	1.70
08/03/00	C-J	Update Demauro pleadings index	.70
08/10/00	TJM	Telephone mail message from and telephone conference with Mr. Demauro	.30
08/17/00	TJM	Telephone conference with Mr. Kimbarovsky	.20
09/21/00	TJM	Review letter from Mr. Kimbarovsky; review Police Board file in response to same and compile pleadings/documents needed to complete the Police Board record; letter to Mr. Kimbarovsky re: same	1.50

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09/22/00	TJM	Revise/finalize letter to Mr. Kimbarovsky; arrange for copying of Police Board pleadings and their transmittal to Mr. Kimbarovsky	.50
09/25/00	TJM	Telephone mail message from and telephone conference with Mr. Kimbarovsky	.30
09/28/00	TJM	Review record of Police Board proceedings filed in answer to Count IV	1.20
10/03/00	TJM	Conference with Mr. Demauro re: potential witnesses	1.00
10/10/00	TJM	Review letter from Mr. Kimbarovsky and proposed motion to revise briefing schedule for administrative review claim; telephone conference with Mr. Kimbarovsky re: same	.30
10/18/00	TJM	Begin work on motion for judgment on count IV (administrative review)	2.00
10/19/00	TJM	Continued work on memorandum in support of motion for judgment on claim for administrative review	2.30
10/20/00	TJM	Continued work on motion for judgment on Count IV; related legal research	2.70
10/23/00	TJM	Continued work on motion for judgment on count IV	1.50
10/24/00	TJM	Continued work on motion for judgment on Count IV	2.30
10/25/00	TJM	Continued work on Motion for Judgment on Count IV	2.80
10/26/00	TJM	Continued work on motion for judgment on Count IV	2.70
10/27/00	TJM	Continued work on motion for judgment on Count IV	2.80

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10/30/00 TJM	Continued work on motion for judgment on Count IV	2.50
10/31/00 TJM	Continued work on motion for judgment on Count IV	3.50
11/01/00 TJM	Continued work on motion for judgment on Count IV; prepare for November 2 court appearance; telephone mail message from and telephone conference with Mr. DeMauro	2.50
11/02/00 TJM	Court appearance; conference with defense counsel; continued work on motion for judgment on Count IV	3.20
11/03/00 MVF	Filed Memorandum in support of Plaintiffs motion for Summary Judgement on Administrative Act Claim Asserted in count IV.	.40
11/03/00 TJM	Final work on motion for judgment on Count IV; arrange for filing service of same; review recent Seventh Circuit opinion re: damages available in Section 1983 case	2.50
11/07/00 TJM	Telephone mail message from Judge Gottshall's minute clerk; letter to Judge Gottschall	.30
11/09/00 TJM	Review/analyze recent appellate court opinion in administrative review of police board case; related legal research	.70
11/30/00 TJM	Conference with Mr. Kimbarovsky re: modifying briefing schedule on administrative review claim; telephone mail message from and telephone conference with Mr. Demauro re: status.	.30
12/11/00 TJM	Telephone mail message from and telephone conference with Mr. Kimbarovsky re: his brief on Count IV	.20
12/19/00 TJM	Begin review/analysis of defendants' brief on administrative review claim and cases cited therein	1.00

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12/26/00 TJM	Telephone mail message from and telephone conference with Mr. DeMauro; complete review/analysis of defendants' administrative review brief	.60
12/27/00 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
01/05/01 TJM	Telephone mail message from and telephone conference with Mr. Kimbarovsky; telephone mail messages from/to and telephone conference with Mr. DeMauro	.50
03/06/01 TJM	Work on reply re: count IV; related legal research	3.50
03/07/01 TJM	Continued work on count IV reply	.70
03/08/01 TJM	Continued work on reply re: count IV	.80
05/31/01 TJM	Conference with Mr. DeMauro	.70
06/01/01 TJM	Review/analyze documents provided by Mr. DeMauro	1.40
06/28/01 TJM	Continued work on administrative review reply	.70
07/02/01 TJM	Telephone mail message from and telephone conference with Judge Gottschall's law clerk; continued work on administrative review reply brief	1.80
07/03/01 TJM	Continued work on administrative review reply brief	2.40
07/09/01 TJM	Continued work on administrative review reply	.80
07/26/01 TJM	Continued work on administrative review reply	2.00
07/27/01 TJM	Continued work on administrative review reply	1.50
07/30/01 TJM	Continued work on administrative review claim reply brief	1.50

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07/31/01 TJM	Continued work on administrative review claim reply brief	2.20
08/01/01 TJM	Continued work on administrative review reply	1.30
08/02/01 TJM	Continued work on administrative review reply	1.30
08/03/01 TJM	Continued work on administrative review reply	3.20
08/06/01 TJM	Continued work on administrative review claim reply brief	2.50
08/07/01 TJM	Continued work on administrative review claim reply	2.80
08/09/01 TJM	Continued work on administrative review reply	.80
08/13/01 TJM	Continued work on administrative review claim reply brief	3.50
08/15/01 TJM	Continued work on administrative review claim reply	1.50
08/16/01 TJM	Continued work on administrative review claim reply	2.50
09/05/01 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
09/06/01 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.50
09/07/01 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.30
09/10/01 TJM	Work on discovery requests	2.00
09/12/01 TJM	Continued work on discovery requests; prepare for 9/13 court appearance	3.50
09/13/01 TJM	Court appearance; conference with Mr. Kimbarovsky; continued work on discovery requests; telephone conference with Mr. DeMauro	3.50

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09/14/01 TJM	Continued work on discovery requests; telephone conference with Mr. DeMauro	.50
09/17/01 TJM	Continued work on discovery requests	.50
09/18/01 TJM	Continued work on discovery; related legal research	.70
09/19/01 TJM	Continued work and discovery requests	.50
09/21/01 TJM	Telephone mail messages from/to Mr. DeMauro; telephone conference with Mr. DeMauro; attempts to reach Mr. Harris; telephone conference with Mr. Harris	.80
10/01/01 TJM	Review letter from Mr. Axel	.20
10/04/01 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
10/09/01 TJM	Telephone mail messages from and telephone conference with Mr. Kimbarovsky	.20
10/25/01 TJM	Review/analyze Police Board/Loren-Maltese Motion For Summary Judgment and Motion For Leave To File same; telephone mail message from Mr. Kimbarovsky	1.80
10/26/01 TJM	Begin work on summary judgment response	1.80
10/29/01 TJM	Continued work on summary judgment response; related legal research	3.90
10/31/01 TJM	Continued work on summary judgment response; telephone mail message from and telephone conference with Mr. Abbot	2.20
11/01/01 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
11/02/01 MJP	Telephone conference with Mr. Genden re summary judgment motion	.20

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11/02/01 TJM	Telephone mail message from and telephone conference with Mr. Genden; review Town summary judgment motion; continued work on summary judgment response	2.50
11/05/01 TJM	Review Rayle Summary Judgment papers and motion for leave to file same; continued work on summary judgment response	2.00
11/06/01 TJM	Continued work on summary judgment response; related legal research	1.20
11/07/01 TJM	Continued work on summary judgment response	.50
11/08/01 TJM	Continued work on summary judgment response	1.30
11/14/01 TJM	Telephone mail message from and telephone conference with Mr. DeMauro; continued work on summary judgment response	2.00
11/16/01 TJM	Continued work on summary judgment response	.50
11/19/01 TJM	Conference with Mr. DeMauro; continued work on summary judgment response	1.50
11/27/01 TJM	Continued work on summary judgement response	1.30
11/28/01 TJM	Continued work on summary judgment response; related legal research	1.70
11/30/01 TJM	Telephone conference with Mr. DeMauro; continued work on Summary judgment response	1.50
12/03/01 TJM	Continued work on summary judgment response	1.00
12/04/01 TJM	Continued work on summary judgment response	.50
12/07/01 TJM	Continued work on summary judgment response	.60
12/11/01 TJM	Continued work on summary judgment response	1.00
12/12/01 TJM	Continued work on summary judgment response	1.00
12/14/01 TJM	Continued work on summary judgment response	1.50

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12/21/01	TJM	Telephone mail message from and telephone conference with Mr. Kimbarovsky	.20
12/27/01	TJM	Continued work on summary judgment response	.70
01/02/02	TJM	Continued work on summary judgment response	.70
01/03/02	TJM	Continued work on summary judgment response	1.50
01/04/02	TJM	Continued work on summary judgment response	1.20
01/07/02	TJM	Continued work on summary judgment response	2.50
01/08/02	TJM	Continued work on summary judgment response	1.30
01/09/02	TJM	Continued work on summary judgment response	2.50
01/10/02	TJM	Continued work on summary judgment response; conference with Mr. DeMauro	1.50
01/11/02	TJM	Continued work on summary judgment response	1.20
01/14/02	TJM	Continued work on summary judgment response	.50
01/15/02	TJM	Continued work on summary judgment response	.50
01/17/02	TJM	Continued work on summary judgment response; review letter from Mr. Kimbarovsky re same	.60
01/24/02	TJM	Review court order; continued work on summary judgment response	2.80
01/25/02	TJM	Continued work on summary judgment response	2.10
01/28/02	TJM	Continued work on summary judgment response	2.20
01/29/02	TJM	Continued work on summary judgment response	2.70

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01/30/02 TJM	Final revisions to summary judgment response; prepare motion for leave to file same; telephone conferences with Mr. Kimbarovsky and Mr. Axel re same; telephone mail messages to/from Mr. Abbot re same; arrange for filing/service; prepare for January 31 court appearance	3.70
01/31/02 TJM	Court appearance; conference with defense counsel prior to same	1.00
02/04/02 TJM	Telephone mail messages from/to and telephone conference with Mr. DeMauro	.20
02/28/02 TJM	Telephone mail message from Mr. Genden; telephone mail message from and telephone conference with Mr. DeMauro	.20
03/01/02 TJM	Telephone mail message from/to and telephone conference with Mr. Genden	.20
03/04/02 TJM	Review/analyze Town, Guido and Rutkia's reply brief regarding motion for summary judgment and certain cases cited therein	.80
03/05/02 TJM	Review/analyze town, Guido and Rutka response to plaintiff's additional facts	.50
03/11/02 TJM	Review/analyze Loren-Maltese and Police Board Reply Brief on Motion for Summary Judgment	.60
03/19/02 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.30
03/25/02 TJM	Telephone mail message from and telephone conference with Mr. DeMauro re case status and 3/19 incident in Cicero	.50
05/07/02 TJM	Telephone mail message from/to and telephone conference with Mr. DeMauro	.20
07/31/02 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20

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09/12/02 TJM	Review memorandum opinion and order denying defendants' motions for summary judgment; telephone conference with Mr. DeMauro re: same	.50
09/24/02 TJM	Letter to Mr. DeMauro re: status; telephone mail message from and telephone conference with Mr. DeMauro	.40
10/02/02 TJM	Prepare for 10/3 court appearance	.30
10/03/02 TJM	Court appearance; conference with defense counsel after same; status report to Mr. DeMauro; conference with Ms. Johnson re organizing file	1.80
11/14/02 TJM	Review/analyze Rayle discovery responses; letter to Mr. Genden re: same	.70
11/21/02 TJM	Telephone mail message and letter from Mr. Genden	.20
12/03/02 TJM	Review Town discovery; telephone mail message from Mr. Schoop	.30
12/05/02 TJM	Telephone mail messages from/to Mr. Schoop and Mr. Kimbarovsky	.50
12/06/02 TJM	Review email and proposed Agreed Motion from Mr. Schoop; telephone mail messages to/from and telephone conference with Mr. Schoop re same	3.20
12/10/02 TJM	Telephone conference with Mr. DeMauro	.20
01/22/03 TJM	Letter to Mr. Kimbarovsky re Loren-Maltese deposition; telephone mail messages from and telephone conference with Mr. Genden re discovery	.30
01/23/03 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20

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02/14/03	TJM	Telephone mail message from and telephone conference with Mr. DeMauro re Interrogatory Answers; telephone mail message from/to Mr. Genden	.50
03/25/03	TJM	Review 3/12 court order and letter from Ms. Conlon; continued work on discovery responses	.50
03/26/03	TJM	Continued work on discovery responses	.50
04/17/03	TJM	Review Motions to Compel; continued work on discovery requests	.50
04/18/03	TJM	Continued work on discovery responses	.50
04/23/03	TJM	Court appearance; conference with defense counsel prior to same; continued work on discovery responses	1.50
04/25/03	TJM	Continued work on discovery responses	1.50
05/01/03	TJM	Telephone mail messages from/to and telephone conference with Mr. DeMauro	.20
05/06/03	TJM	Conference with Mr. DeMauro re discovery responses; continued work on same	2.50
05/12/03	TJM	Continued work on discovery responses	2.80
05/14/03	TJM	Arrange for copying/production of tax documents; letter to defense counsel re same	.50
05/16/03	TJM	Continued work on discovery responses	1.80
05/19/03	TJM	Continued work on discovery responses; letter to Mr. Genden re same	3.50
05/21/03	TJM	Continued work on discovery responses; arrange for production of documents; telephone mail message from and telephone conference with Mr. Genden	2.20
05/21/03	TJM	Complete work on discovery responses; arrange for service of same	.50

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07/29/03	AGM	Assignment re. court appearance re. extension of time.	.40
07/30/03	AGM	Court appearance re. motion for extension of time.	.80
08/05/03	TJM	Telephone conferences with Mr. DeMauro	.20
08/09/03	TJM	Conference with Mr. DeMauro re settlement and discovery compliance	.70
09/02/03	TJM	Telephone conference with Mr. DeMauro	.20
09/17/03	TJM	Review tax documents produced to defendants in light of asserted deficiencies; telephone conference with Mr. DeMauro	.70
09/19/03	TJM	Telephone conference with Mr. DeMauro	.20
09/25/03	TJM	Telephone mail messages from and telephone conference with Mr. DeMauro re settlement and his deposition	.30
10/01/03	TJM	Draft demand letter to Mr. Kunkle and Ms. Conlon ; telephone conference with Mr. DeMauro re same	1.00
10/02/03	TJM	Revise/finalize demand letter to Mr. Kunkle and Ms. Conlon	.30
10/13/03	TJM	Deposition preparation conference with Mr. DeMauro; prepare for same	3.50
10/14/03	TJM	Deposition of Mr. DeMauro; conferences with Mr. DeMauro before/during/after same	7.20
10/27/03	TJM	Review Agreed Motion to Extend Discovery Cut-off	.20
11/03/03	TJM	Review 10/29 Court Order	.20
12/03/03	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20

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12/19/03	TJM	Telephone mail messages from and telephone conference with Mr. DeMauro	.30
01/08/04	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
01/10/04	TJM	Conference with Mr. DeMauro re settlement	1.20
01/26/04	TJM	Letter to Mr. Kunkle and Ms. Conlon re settlement; letter to Mr. Vrdolyak re same; telephone mail message from and telephone conference with Ms. Conlon; telephone mail messages from/to and telephone conference with Mr. Genden	1.30
01/28/04	TJM	Review defendants' motion to extend discovery and Ms. Conlon's fax re change of court date	.20
02/04/04	TJM	Telephone conference with Mr. DeMauro; prepare for 2-5 court appearance	.20
02/23/04	TJM	Letter to Mr. DeMauro re settlement conference	.20
02/25/04	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
03/05/04	TJM	Telephone conference with Mr. DeMauro re 3-19 settlement conference	.30
03/09/04	TJM	Telephone conference with Mr. DeMauro	.20
03/12/04	TJM	Prepare for 3-13 client meeting	.20
03/13/04	TJM	Conference with Mr. DeMauro re 3-19 settlement conference	.50
03/18/04	TJM	Letter to Judge Gottschal; review settlement correspondence and otherwise prepare for 3/19 settlement conference	.30
03/19/04	TJM	Prepare for and attend settlement conference; conferences with Mr. DeMauro before/after same	1.50
05/10/04	TJM	Edit/correct billing records	.50

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05/11/04 TJM	Review email from Mr. Genden and proposed stipulation re Mr. Rayle; email to Mr. Genden re same; telephone conference with Mr. DeMauro	1.00
05/13/04 TJM	Review/revise billing records	.30
05/18/04 TJM	Telephone mail messages from/to Mr. Genden	.20
05/19/04 TJM	Telephone mail message from and telephone conference with Mr. Genden	.50
05/27/04 TJM	Telephone mail messages from/to Mr. Genden; telephone conference with Mr. DeMauro	.20
06/02/04 TJM	Telephone mail message from and telephone conference with Mr. Lyman re settlement conference; telephone mail messages from/to Ms. Conlon; prepare Notice of Deposition for Bacon; review letter from Ms. Conlon; prepare response to same	.50
06/08/04 TJM	Letter to Warden Clark; telephone mail message to Ms. Kurtz	.20
06/16/04 TJM	Telephone mail messages from and telephone conference with Mr. Genden	.30
06/17/04 TJM	Telephone mail message from and telephone conference with Mr. Genden	.20
06/23/04 TJM	Telephone mail message from and telephone conference with Mr. Genden	.40
06/28/04 TJM	Email correspondence with Ms. Conlon re Guido deposition; review letter from Mr. Genden and attached proposed Stipulation	.30
06/30/04 TJM	Telephone mail message from and telephone conference with Mr. Genden	.30
07/07/04 TJM	Telephone mail message from and telephone conference with Mr. DeMauro; email correspondence with Mr. Genden	.30

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07/08/04 TJM	Telephone conference with defense counsel re Rayle and Loren-Maltese issues	.30
07/15/04 TJM	Telephone mail message from and telephone conference with Mr. Genden	.30
07/20/04 TJM	Deposition of Louis Guido; prepare for same; conferences with defense counsel before and after same; telephone conference with Mr. DeMauro	3.80
07/21/04 TJM	Telephone mail message from and telephone conference with Mr. Genden	.20
08/03/04 TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.30
08/16/04 TJM	Telephone mail message from and telephone conference with Mr. DeMauro re Mr. Berger	.30
08/26/04 TJM	Compile exhibits and otherwise prepare for 8-27 Rayle deposition	.50
08/27/04 TJM	Rayle deposition; final preparation for same	3.10
09/08/04 TJM	Review letter from Mr. Genden and proposed Stipulation; letter to Mr. Genden re same; review Mr. Genden's 8/30 letter to Ms. Colfo; prepare check request for Mr. Rayle	.70
09/09/04 TJM	Letter to Mr. Genden re Rayle travel expenses	.20
09/14/04 TJM	Telephone mail messages from/to and telephone conference with Mr. DeMauro	.30
09/22/04 TJM	Telephone mail messages from and telephone conference with Mr. DeMauro re status	.20
10/28/04 TJM	Review court order	.20
11/05/04 TJM	Work on Loren-Maltese deposition	.50
11/15/04 TJM	Work on Loren-Maltese deposition	1.80

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11/16/04	TJM	Continued work on Loren-Maltese deposition	1.80
11/17/04	TJM	Continued work on Loren-Maltese deposition	1.20
11/19/04	TJM	Continued work on Loren-Maltese deposition	.80
11/22/04	TJM	Telephone mail message from and telephone conference with Mr. DeMauro re status	.20
11/29/04	TJM	Review Town offer of judgment; letter to Mr. DeMauro; conference with Mr. Karsh and legal research re same; review notary affidavit re Mr. Rayle	1.30
12/03/04	TJM	Conference with Ms. Montgomery re: her legal research on Rule 68; continued work on Loren-Maltese Disposition.	.70
12/07/04	TJM	Prepare for 12/8 court appearance.	.20
12/09/04	TJM	Court appearance; telephone mail messages to/from and telephone conference with Mr. DeMauro.	1.20
01/11/05	TJM	Review letter from Mr. Perkins; begin preparing response to same.	.20
01/14/05	TJM	Review defendants' motions; telephone conference with Mr. DeMauro.	.30
01/19/05	TJM	Prepare for 1/20 court appearance.	.20
01/20/05	TJM	Court appearance; conference with Ms. Conlon and Mr. Kimbarovsky before same; telephone conference with Mr. DeMauro.	.70
02/15/05	TJM	Prepare for 2/16 court appearance.	.20
02/16/05	TJM	Court appearance; telephone conference with Mr. Demauro	1.20
02/18/05	TJM	Telephone conference with Ms. Conlon; telephone mail message to Judge Gotschall's clerk	.20

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03/07/05	TJM	Telephone mail messages from/to and telephone conference with Mr. Demauro re: status and potential effect of election on settlement	.20
03/15/05	TJM	Review defendants' motion for summary judgment	.50
03/16/05	TJM	Prepare for 3/17 court appearance	.20
03/17/05	TJM	Court appearance; letter to camp administrator Gaunder re: Loren-Maltese deposition	.70
03/22/05	TJM	Conference with Mr. Ficaro re: Loren-Maltese deposition; telephone conference with Mr. Loevy re: same; review fax from Ms. Conlon; telephone mail message from and telephone conference with Mr. DeMauro; telephone mail message to and telephone conference with Ms. Conlon	.60
03/24/05	TJM	Telephone mail message to Mr. LaFave re: Loren-Maltese deposition; conference with Mr. Perkins re: same	.30
03/28/05	TJM	E-mail from Ms. Conlon; conference with Ms. Montgomery re: preparing motion to extend time to file pretrial order	.20
03/29/05	ARM	Draft Agreed Motion to Extend Deadline for Filing of Pretrial Order.	1.30
03/30/05	ARM	Edit Agreed Motion to Extend Deadline to File Pretrial Order. Prepare Motion for filing.	.60
04/06/05	TJM	Telephone mail message from/to Mr. Perkins re Loren-Maltese deposition; telephone mail message to Mr. Rickli and telephone conference with Mr. LaFave re same; review fax from Mr. LaFave re same; telephone conference with Ms. Conlon re same	.40
04/11/05	TJM	Begin work on Summary Judgment Response	.80

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04/12/05 TJM	Telephone mail messages from/to Mr. Ficaro; telephone mail message from and telephone conference with Mr. DeMauro; work on Summary Judgment Response	2.70
04/14/05 TJM	Continued work on Summary Judgment Response; Letter to Mr. LaFave	3.80
04/16/05 TJM	Continued work on Summary Judgment Response	1.50
04/18/05 ARM	Research issue of improper motives in employment termination	1.00
04/18/05 TJM	Research assignment to Ms. Montgomery; continued work on Summary Judgment Response	4.50
04/19/05 TJM	Continued work on Summary Judgment Response; telephone conference with Mr. DeMauro; prepare Motion to Reset Dates; attempt to contact Mr. LaFave	3.90
04/20/05 TJM	Draft Motion to Reset Dates; telephone conference with and telephone mail message from Mr. Hunt; telephone mail message from Mr. Rickli; continued work on Summary Judgment Response	3.70
04/21/05 TJM	Telephone mail message from and telephone conference with Mr. Hunt.	.20
04/22/05 TJM	Telephone conference with Mr. DeMauro; final Revisions to Motion to Reset Dates; continued work on Summary Judgment Response; conference with Mr. Perkins.	3.80
04/25/05 APB	File plaintiff's motion to reset trial dates and notice; deliver courtesy copy to Judge's chambers	.40
04/25/05 TJM	Telephone mail messages from and telephone conference with Mr. Caravetta; continued work on Summary Judgment Response	1.20

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04/26/05 TJM	Continued work on summary judgment response; conference with Mr. DeMauro re: same	3.50
04/27/05 TJM	Continued work on summary judgment response; review defendants' responses to motion to reset dates; review file and otherwise prepare for 4/28 court appearance; telephone mail message from and telephone conference with Mr. Ficaro	3.20
04/28/05 TJM	Court appearance; conference with Mr. Hunt and Ms. Conlon after same; review Victorville visiting regulations; revise Motion to Compel Videotaped Deposition	1.20
04/29/05 TJM	Review preparation for Loren-Maltese deposition	1.20
05/04/05 TJM	Telephone mail message from and telephone conference with Mr. DeMauro; prepare order re: videotaped deposition; travel arrangements; telephone conference with Ms. Conlon re: same	.40
05/05/05 TJM	Court appearance; telephone and personal conferences with Mr. Hunt; travel arrangements and preparation for Loren-Maltese deposition; letter to Mr. Rickli re: same	1.20
05/06/05 TJM	Travel arrangements and preparation for Loren-Maltese deposition; telephone mail message from and telephone conference with Mr. Hunt re: same	2.30
05/09/05 TJM	Prepare for Loren-Maltese deposition	2.60
05/10/05 TJM	Travel to California for 5/11 Loren-Maltese deposition; telephone mail messages from/to Ms. Kurtz	4.30
05/11/05 TJM	Loren-Maltese deposition; travel from California to Chicago after same	4.30
05/12/05 TJM	Prepare expense report; telephone mail message from Mr. DeMauro	.30
05/13/05 TJM	Continued work on summary judgment response	1.50

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05/13/05	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
05/17/05	TJM	Begin review of Loren-Maltese deposition transcript; continued work on summary judgment response	1.30
05/17/05	TJM	Begin review of Loren-Maltese deposition transcript; continued work on summary judgment response	1.30
05/20/05	TJM	Continued work on summary judgment response	1.40
05/23/05	TJM	Continued work on summary judgment response	1.80
06/02/05	TJM	Telephone mail message to and telephone conference with Mr. DeMauro re: settlement	.30
06/03/05	TJM	Continued work on summary judgment response	2.30
06/06/05	TJM	Continued work on summary judgment response; review letter from Ms. Conlon; telephone conference with Ms. Conlon; settlement demand letter to Mr. Delgaldo; telephone mail messages to/from and telephone conference with Mr. Demauro	3.20
06/18/05	TJM	Review Town motion; telephone mail message to Mr. Hunt re: same	.20
06/22/05	TJM	Prepare for 6/23 court appearance	.20
06/23/05	TJM	Court appearance	.80
07/13/05	TJM	Telephone mail message from and telephone conference with Mr. Demauro; telephone call to Mr. Delgaldo	.30
07/25/05	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
07/28/05	TJM	Telephone conference with Ms. Tomchey re settlement; telephone mail messages to/from and telephone conference with Mr. DeMauro re same	.40

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07/29/05	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
08/05/05	TJM	Telephone mail messages to/from Ms. Tomchey; telephone mail message from and telephone conference with Mr. DeMauro	.30
08/08/05	TJM	Telephone mail messages from and telephone conference with Mr. DeMauro	.30
08/10/05	TJM	Telephone mail messages from/to Ms. Tomchey's assistant; telephone mail message to Ms. Tomchey; telephone conference with Mr. DeMauro	.50
08/11/05	TJM	Telephone mail message from Ms. Tomchey; telephone mail message from and telephone conference with Mr. DeMauro	.40
08/12/05	TJM	Telephone conference with Ms. Tomchey; review certain interrogatory answers and provide same to Ms. Tomchey; telephone conference with Mr. DeMauro	.70
08/20/05	TJM	Telephone mail messages from and telephone conference with Mr. DeMauro	.20
08/30/05	TJM	Telephone mail messages to/from Ms. Tomchey; prepare for 8/31 court appearance; telephone mail message from and telephone conference with Mr. DeMauro	.50
08/31/05	TJM	Court appearance; conference with Ms. Tomchey after same	.80
09/01/05	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.20
09/08/05	TJM	Review settlement file to prepare for 9/9 conference with Mr. DeMauro	.30
09/09/05	TJM	Review Tribune article re Mr. Gross; conference with Mr. DeMauro; prepare for same; telephone email message to Ms. Kurtz	1.80

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09/15/05 TJM	Begin review of pleadings and related court file documents in Gross case	.50
09/22/05 TJM	Email correspondence with Ms. Tomchey; telephone mail message from Mr. DeMauro	.30
10/03/05 TJM	Telephone mail message to Ms. Tomchey; telephone mail message from and telephone conference with Mr. DeMauro	.30
10/04/05 TJM	Prepare for 10/5 court appearance and conference with Ms. Tomchey	.50
10/05/05 TJM	Court appearance; conferences with Ms. Tomchey, Ms. Conlon and Mr. Hunt before/after same; review email and letter from Ms. Tomchey; telephone mail message from and telephone conference with Mr. DeMauro	1.60
10/07/05 TJM	Conference with Mr. DeMauro re settlement; prepare for same	1.50
10/10/05 TJM	Begin work on demand letter to Ms. Tomchey	.40
10/26/05 TJM	Telephone mail message from and telephone conference with Ms. Kurtz re Mr. Gross	.40
10/28/05 TJM	Review Tribune article re Rhonda Gross case settlement	.20
10/31/05 TJM	Work on demand letter	.50
11/01/05 TJM	Continued work on demand letter	1.20
11/02/05 TJM	Continued work on demand letter; conference with Mr. Delagrange re prejudgment interest calculation	1.30
11/15/05 TJM	Telephone mail messages from and telephone conference with Mr. DeMauro	.30
11/17/05 TJM	Review Court Order	.20

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11/21/05	TJM	Conference with Ms. Tomchey; telephone conference with Mr. DeMauro	.30
11/22/05	TJM	Telephone conferences with Ms. Conlon and Mr. DeMauro	.30
11/30/05	TJM	Review letter from Ms. Conlon; prepare for 12/1 court appearance	.20
12/01/05	TJM	Court appearance; conference with Ms. Conlon prior to same	.50
12/13/05	TJM	Telephone mail message from and telephone conference with Mr. DeMauro re status of and outlook for settlement negotiations	.40
12/22/05	TJM	Telephone mail message from and telephone conference with Mr. DeMauro re settlement and pension issues	.30
12/29/05	TJM	Review court notice re settlement conference; prepare motion to reschedule same	.30
12/30/05	APB	Deliver courtesy copy of motion to Judge's chambers	.40
01/04/06	TJM	Telephone mail message from and telephone conference with Mr. DeMauro re status and settlement strategy	.30
01/05/06	TJM	Prepare for 1/6 court appearance	.20
01/06/06	TJM	Court appearance	.70
02/01/06	TJM	Court appearance; telephone conference with Mr. DeMauro	1.70
02/03/06	TJM	Telephone mail message from and telephone conference with Mr. DeMauro; work on summary judgment response	1.30
02/06/06	TJM	Continued work on summary judgment response	.50
02/08/06	TJM	Work on summary judgment response	1.50

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02/09/06	TJM	Continued work on summary judgment response; telephone conference with Ms. Kurtz	4.30
02/10/06	TJM	Continued work on summary judgment response	3.50
02/10/06	TJM	Continued work on summary judgment response	4.50
02/11/06	TJM	Continued work on summary judgment response	2.50
02/12/06	TJM	Continued work on summary judgment response	3.50
02/13/06	JBW	Conference with Mr. Moran re: research assignment; research re: motivation in employment cases on summary judgment; conference with Ms. Hendrickson re: same	4.20
02/13/06	TJM	Conference with Ms. Berger-White re legal research assignment; continued work on summary judgment response; telephone conferences with Mr. Hernandez and Mr. DeMauro re their affidavits; telephone mail message to Ms. Kurtz	4.80
02/14/06	JBW	Research re: motivation	2.50
02/14/06	TJM	Continued work on summary judgment response; conference with Mr. Hernandez and telephone conference with Mr. DeMauro re their respective affidavits	6.80
02/15/06	ARM	Research caselaw re: summary judgment standards for conspiracy and bias in due process claims.	1.80
02/15/06	TJM	Continued work on summary judgment response	5.80
02/16/06	TJM	Continued work on summary judgment response	3.50
02/17/06	TJM	Continued work on summary judgment response	6.20
02/22/06	TJM	Telephone conference with Ms. Johnson re: Gross transcript redactions	.30
02/23/06	APB	Deliver courtesy copy to Judge's chambers	.40

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02/23/06	TJM	Review courtesy copy binder of summary judgment response	.20
02/26/06	TJM	Draft letter to Magistrate Judge Keys	.30
02/27/06	TJM	Telephone mail message from and telephone conference with Judge Keys' clerk	.20
03/03/06	TJM	Review Town Motions re Gross Exhibit; prepare notes for Response to and court appearance re same; conference with Ms. Johnson re filing exhibit under seal; review Ms. Tomchey's email to Ms. Kurtz and Mr. Mammel	1.70
03/04/06	TJM	Revise billing records	.50
03/06/06	TJM	Review revised billing records	.20
03/07/06	TJM	Telephone mail message from and telephone conference with Mr. DeMauro re 3/10 settlement conference	.20
03/08/06	TJM	Review/analyze defendants' Summary Judgment Reply Memorandum and Response to Plaintiff's L.R.56.1 Statement of Facts	.80
03/09/06	TJM	Telephone mail messages from/to and telephone conference with Mr. DeMauro; prepare for 3/10 settlement conference	1.10
03/10/06	TJM	Settlement conference; conferences with Mr. DeMauro before/after same	1.20
03/15/06	TJM	Telephone mail message from and telephone conference with Ms. Kurtz; telephone conferences with Mr. Mammel and Mr. Ekl	.80
03/17/06	TJM	Telephone conference with Mr. DeMauro regarding status and trial strategy; witness activities in gross case	3.50
03/21/06	TJM	Telephone conference with Mr. DeMauro	.20

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03/30/06	TJM	Review/analyze memorandum opinion regarding summary judgment motion ; telephone conference with Mr. DeMauro	.70
04/04/06	TJM	Telephone mail message from and telephone conference with Mr. DeMauro	.30
04/19/06	PCM	Conference with Mr. Moran re: facts of the case; review motion for summary judgment, response and reply	4.00
04/19/06	TJM	Conference with Mr. McLeod re facts of case and Pretrial Order	.50
04/20/06	PCM	Review statement of material facts and statement of additional material facts; prepare final pre-trial order statement of uncontested facts	6.50
04/22/06	PCM	Meeting with Mr. DeMauro re: preparation for trial; travel to and from meeting	3.80
04/22/06	TJM	Trial strategy conference with Messrs. DeMauro and McLeod	1.60
04/24/06	PCM	Draft final pre-trial order - witness list and statement of contested facts	4.30
04/25/06	PCM	Draft final pre-trial order	2.60
04/26/06	PCM	Review Seventh Circuit pattern jury instructions and jury instructions from prior cases; draft plaintiff's proposed jury instructions	6.10
04/27/06	PCM	Review Judge Gottschall's voir dire questions and questions from prior cases; draft proposed voir dire questions; draft proposed jury instructions; review documents including Mr. DeMauro's tax returns and documents relating to charges and dismissal hearing	7.80

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04/28/06	PCM	Meeting with Mr. DeMauro re: witnesses and documents; meeting with Mr. Moran re: witness and status of pretrial order; review due process jury instructions and Police Board hearing documents	7.40
04/28/06	TJM	Conferences with Mr. DeMauro and Mr. McLeod	1.80
05/01/06	PCM	Research jury instructions re: due process claim	1.50
05/02/06	PCM	Draft statement of uncontested fact, voir dire question, jury instructions and statement re: settlement negotiations; conference with Mr. Moran re: same	6.00
05/02/06	TJM	Conferences with Mr. McLeod regarding pretrial order	1.80
05/03/06	PCM	Draft statement of contested facts; conferences with Mr. Moran	4.80
05/03/06	TJM	Work on final pretrial order; conferences with Mr. McLeod regarding same	1.70
05/04/06	PCM	Conference with Mr. Moran re: background on Cicero cases; review income tax records and Board of Elections materials from Mr. DeMauro; research information available from State Board of Election; conversation with clerk at State Board in Springfield and Chicago Branch	1.80
05/04/06	TJM	Conference with Mr. McLeod re: case background facts	.40
05/08/06	PCM	Review case file including pleadings and discovery	4.20
05/10/06	APB	File appearance	.40
05/10/06	PCM	Obtain and review Loren-Maltese Committeeman fund schedules re: 1997 and 1998 political donors	3.70

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05/12/06 TJM	Work on Pretrial order	.50
05/14/06 PCM	Review docket re: appearances by Mr. Ficaro and Mr. Hunt; prepare memo to Mr. Moran; prepare final pretrial order	3.00
05/15/06 PCM	Draft final pretrial order exhibits and facts sections; conferences with Mr. Moran	7.80
05/15/06 TJM	Telephone mail message from and telephone conference with Mr. Ficaro; conference with Mr. McLeod regarding same; review memo from Mr. McLeod; telephone mail message to Mr. Hunt	.50
05/16/06 PCM	Draft jury instructions; conference with Mr. Moran re: pretrial order	3.80
05/16/06 TJM	Conference with Mr. McLeod regarding pretrial order; telephone conferences with Mr. Hunt, Ms. Tomchey and Mr. Ficaro	1.10
05/17/06 PCM	Review discovery documents including dismissal hearing transcripts	5.90
05/17/06 TJM	Review draft pretrial order; telephone conference with Mr. Hernandez regarding trial date/testimony	1.50
05/18/06 PCM	Draft final pretrial order re: wages; review documents for exhibit list; telephone conversation with Mr. DeMauro	3.90
05/19/06 PCM	Review and revise final pretrial order statement of uncontested facts, exhibit list and jury instructions; meeting with Mr. Moran and Mr. DeMauro re: final pretrial order, documents and witnesses	7.30
05/19/06 TJM	Work on pretrial order; conferences with Mr. Demauro and Mr. McLeod regarding same	3.50
05/20/06 TJM	Trial preparation	1.20
05/22/06 PCM	Review damages re: lost wages	1.60

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05/22/06	TJM	Continued work on pretrial order; review court notice; conference with Mr. McLeod	.80
05/23/06	PCM	Review wage calculations; revise statement of contested facts; conference with Mr. Moran re: trial preparation and 5/25 court date.	2.40
05/23/06	TJM	Continued work on pretrial order and trial preparation; conference with Mr. McLeod regarding same and regarding 5/25 court appearance	4.50
05/24/06	PCM	Prepare deposition designations for Ms. Loren-Maltese and Mr. Rayle; Conversation with Mr. DeMauro re: lost wages and actual earnings; conference with Mr. Moran	1.60
05/24/06	TJM	Conference with Mr. McLeod regarding pretrial order	.20
05/25/06	PCM	Conversation with Mr. DeMauro re: earnings documents; determine bates references for exhibits; telephone conference with Mr. Moran	.60
05/25/06	TJM	Court appearance; telephone conference with Mr. McLeod regarding same	2.20
05/26/06	PCM	Draft bates references for exhibits; conversation with Mr. Roche re: collective bargaining agreements;	2.90
05/30/06	PCM	Revise final pretrial order; conference with Mr. Moran re: same	2.80
05/30/06	TJM	Conference with Mr. McLeod regarding status of pretrial order; review email correspondence with defense counsel regarding same; review fax from Mr. Hunt; conferences with Mr. McLeod regarding same; review Mr. McLeod's email response; trial preparation	2.70

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05/31/06	PCM	Review pretrial order with Mr. Moran; revise jury instructions; calculate lost wages based on wage schedules from collective bargaining agreements; review exhibit and witness lists	6.90
05/31/06	TJM	Review Defendants' Pretrial Order submissions and related email; conferences with Mr. McLeod re same and re revisions to plaintiffs' submissions in light of same; trial preparation	4.80
06/01/06	PCM	Review exhibits letter; compare defendants' latest pretrial order submissions to prior submissions noting the differences; prepare statement of contested facts	1.80
06/01/06	PCM	Attend conference call with defendants re: finalizing pretrial order; revise schedules (h) and (b) of the final pretrial order and jury instructions; review revisions and documents produced by defendants; second conference call with defendants re: finalization of pretrial order; third conference call with defendants re: final revisions to jury instructions; review defendant's revisions; revise motions in limine; draft objections to defendants' exhibits; calculate special damages; draft trial brief	10.30
06/01/06	TJM	Continued work on Final Pretrial Order; conferences with Mr. McLeod and telephone conferences with defense counsel re same	5.60
06/02/06	PCM	Revise special damages calculation and jury instructions; draft trial brief; conference with Mr. Spataro and Mr. Moran re: finalization of final pretrial order and signatures; draft motion in limine no. 2; revise motion in limine no. 1; compile sections of final pretrial order in preparation for filing; edit trial brief; oversee scanning and filing of final pretrial order	9.10
06/02/06	TJM	Final work on Pretrial Order; conference with Mr. McLeod and Mr. Spataro re same	5.50

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06/05/06	PCM	Conference with Mr. Moran re: responses to defendants' motions in limine	1.50
06/05/06	TJM	Review/analyze defendants' Motions In Limine; conference with Mr. McLeod re responses to same	1.30
06/06/06	PCM	Telephone call to Legallink re: snapshot of Ms. Loren-Maltese from video deposition; review portion of Ms. Loren-Maltese's video deposition re: prison attire; conference with Mr. Moran	1.50
06/06/06	TJM	Review portion of Loren-Maltese deposition videotape with Mr. McLeod; conference with Mr. McLeod re trial preparation and Motions In Limine	1.50
06/07/06	PCM	Draft responses to defendants motions in limine 1-10; draft motion to amend final pretrial order re: addition of Mr. DeMauro's precinct lieutenant card as plaintiff's exhibit no. 50	2.90
06/07/06	TJM	Trial preparation; conference with Mr. McLeod re Motion to Amend Pretrial Order; review/revise motion	1.50
06/08/06	PCM	Research re: issue of admissibility of evidence of similarly situated employees and widespread practice; conversation with Mr. DeMauro re: Jerry Rodish and Larry Dominick; conversation with Ms. Kurtz re: testimony of Mr. Gross; revise witness list	6.80
06/08/06	TJM	Trial preparation	1.20
06/09/06	PCM	Draft responses to defendants' motions in limine	5.70
06/09/06	TJM	Trial preparation	1.80
06/12/06	PCM	Conversation with Mr. DeMauro re: witness list	.20
06/14/06	TJM	Review/revise draft Motions In Limine response	.80

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06/15/06	PCM	Appearance for motion to amend final pretrial order; phone conference with Mr. DeMauro re: tax documents; revise motions in limine	.90
06/15/06	TJM	Email correspondence with Mr. McLeod re pretrial submissions	.20
06/16/06	MJP	Conference with Mr. McLeod re: motions in limine	.20
06/16/06	PCM	Attempt to contact Mr. Moran in Greece via telephone, fax and email; draft emergency motion to extend time to respond to defendants' motions in limine; conference with Mr. Piers	4.50
06/17/06	TJM	Email correspondence with Mr. McLeod re pretrial issues	.20
06/19/06	TJM	Email correspondence with Mr. McLeod re response to defendants' expert motion	.30
06/20/06	PCM	Draft objection to defendants motion to add expert	2.90
06/21/06	PCM	Prepare for hearing on motion to extend time to respond to defendants' motions in limine	.40
06/22/06	PCM	Appearance to present and argue motion for extension of time	1.20
06/26/06	TJM	Review response to defendants' expert motion; conferences with Mr. McLeod re same, 6/22 court appearance and other recent developments; telephone mail messages to Mr. Hunt and Mr. Spataro; trial preparation	3.30
06/26/06	TJM	Email review of parties' motions and other filings; email to Mr. McLeod re same	.50
06/27/06	PCM	Revise responses to motions in limine; conference with Mr. Moran	2.40

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06/27/06	TJM	Review/analyze defendants' response to motion in limine (and cases cited); outline reply and confer with Mr. McLeod re same; continued work on response to defendants' motion in limine; conferences with Mr. McLeod re same; review court orders; trial preparation	4.80
06/28/06	PCM	Prepare responses to defendants' motions in limine; conference with Mr. Moran re: same	1.20
06/28/06	TJM	Draft motion in limine no. 1 reply memorandum; begin work on memorandum in opposition to defendants' motion for leave to disclose expert; conferences with Mr. McLeod; telephone mail messages from/to Mr. Hunt	4.50
06/29/06	PCM	Draft memorandum in opposition to defendants' motion to add expert; conversation with Mr. Spataro re: trial dates; prepare letter to Judge Gottschall re: same; conference with Mr. Moran	1.90
06/29/06	TJM	Trial preparation; work on response to defendants' expert motion; revise draft letter to Judge Gottschal; telephone mail message from and telephone conference with Ms. Kurtz; conference with Mr. McLeod	4.80
06/30/06	PCM	Arrange for and supervise filing of memorandum in opposition to defendants' motion to add expert	1.20
06/30/06	TJM	Trial preparation	.50
07/05/06	APB	File plaintiff's memorandum in opposition to defendants' motion for leave to disclose expert	.40
07/07/06	TJM	Review court order; conference with Mr. McLeod re contacting client re same	.20
07/10/06	PCM	Review defendants' reply brief for motions in limine; conversation with Mr. DeMauro re: tax documents; conference with Mr. Moran	.60

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07/10/06	TJM	Telephone mail messages from/to and telephone conference with Mr. Hernandez re trial date and his testimony; review/analyze defendants' Motion In Limine reply; conference with Mr. McLeod re same	1.30
07/12/06	PCM	Conversation and email with Mr. Hunt re: filing late reply brief; conference with Mr. Moran re: same	.20
07/12/06	TJM	Trial preparation; conference with Mr. McLeod re defendants' request for time to file expert motion reply	1.50
07/17/06	TJM	Trial preparation; review defendants' expert motion Reply Brief; conference with Mr. McLeod	1.30
07/18/06	PCM	Review defendants motion to extend time to file final pre-trial order	.30
07/19/06	PCM	Conversation with Mr. DeMauro; review tax documents and fax to Mr. DeMauro's accountant	.40
07/20/06	PCM	Prepare and assemble exhibits for exhibit book	3.70
07/27/06	PCM	Review tax documents for exhibits; draft letter to Mr. Hunt; trial preparation conference with Mr. Moran	1.10
07/27/06	TJM	Conference with Mr. McLeod re trial preparation	.30
08/03/06	TJM	Trial preparation	1.50
08/04/06	PCM	Prepare trial subpoenas	.90
08/04/06	TJM	Trial preparation	1.60
08/07/06	TJM	Trial preparation; telephone conference with Mr. Demauro	2.10
08/08/06	TJM	Review defendant's expert reply and motion for leave to file same; trial preparation	2.70

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08/09/06	PCM	Preparation for final pretrial conference including review of motions in limine and assembly of documents; conversation with Mr. Hunt re: deposition designations; appearance for final pretrial conference; review intracorporate conspiracy doctrine and exceptions; conversation with Mr. DeMauro re: Judge Gottschall's rulings on motions in limine	5.40
08/09/06	TJM	Telephone mail messages from/to and telephone conference with Mr. Hunt; pretrial conference; conferences with Mr. McLeod and other preparation for same; review letter from Mr. Hunt and defendant deposition designations; review defendant conspiracy motion and cited cases	5.20
08/10/06	PCM	Conversation with Mr. DeMauro re: witness addresses and Saturday meeting; review defendants' cited case law; research difference between Section 1985 and 1983 actions; and draft response to defendant's motion in limine	2.40
08/10/06	TJM	Trial preparation	1.80
08/11/06	TJM	Trial preparation; review defendants' proposed order re: Ms. Loren-Maltese; conferences with Mr. McLeod; telephone conference with Mr. Hernandez	4.20
08/12/06	PCM	Meeting with Mr. DeMauro re: case strategy and to go over payroll records produced by the Town; travel to/from for same	4.60
08/12/06	TJM	Trial preparation; telephone mail message from Mr. McLeod re: his meeting with Mr. Demauro	1.30
08/14/06	PCM	Draft letters to subpoenaed witnesses re: date of testimony	.80
08/14/06	TJM	Trial preparation	3.10

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08/15/06	PCM	Conversation with Mr. DeMauro re: service of trial subpoenas; research intra-corporate conspiracy doctrine; revise response to defendants' motion to bar claim for conspiracy; conference with Mr. Moran	3.20
08/15/06	TJM	Work on response to defendants' conspiracy motion in limine; conferences with Mr. McLeod re: same; trial preparation	3.50
08/16/06	PCM	Draft response brief to defendants' motion to bar evidence of conspiracy; prepare trial subpoenas and letters	.20
08/16/06	TJM	Telephone conference with Mr. Hernandez; final work on response to defendants' conspiracy motion to limine; trial preparation; review court orders	3.60
08/18/06	NMM	Courtesy Copy	.40
08/19/06	TJM	Trial preparation	2.20
08/21/06	TJM	Trial preparation; conference with Mr. Hernandez	3.60
08/22/06	TJM	Telephone mail message from Mr. Demauro re: witness addresses; telephone mail message to Mr. McLeod re: same; continued trial preparation; legal research re: allocation of peremptory challenges (28 U.S.C. Sec. 1970)	1.80
08/23/06	PCM	Prepare subpoenas for Mr. Prossnitz and Mr. Graf; review Section 1970; draft motion to limit defendants' peremptory challenges; conference with Mr. Moran re: same obtain Order from Hanania case re: release of Loren-Maltese to testify; review defendants' reply brief in support of motion to bar evidence of conspiracy; review cited case law; scan and produce tax documents to defendants	6.90

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08/23/06 TJM	Conference with Mr. McLeod re: peremptory challenge motion; trial preparation; review defendants' conspiracy motion reply and certain cases cited therein; review/revise peremptory challenge motion; prepare for 8/24 pretrial conference; conferences with Mr. McLeod re: above	5.50
08/24/06 PCM	Draft and revise statement of the case; mark deposition designations for submission to the Court; appearance for continued final pretrial conference; review docket re: orders to allow Loren-Maltese to wear street clothes and wig; preparation for final pretrial conference; conferences with Mr. Moran	7.30
08/24/06 TJM	Pretrial conference; prepare for same; review Mr. Hunt's letter to Judge Gottschall; review/revise Statement of the Case; letter to Judge Gottschall; trial preparation; conferences with Mr. McLeod re: above; work on Rayle deposition designations	7.20
08/25/06 NMM	Courtesy Copy	.40
08/25/06 PCM	Contact attorneys and determine status of case currently on trial before Judge Gottschall; phone conversation with Ms. Kurtz re: testimony of Mr. Gross; conversation with Mr. Terracino re: testimony; conversation with Mr. Perry re: testimony; obtain witness phone numbers; review letter from Mr. Hunt; draft letter to Judge Gottschall re: deposition designations and statement of case; designate defendants' deposition objections; conferences with Mr. Moran	2.20
08/25/06 TJM	Work on deposition designations; review letter from Mr. Hunt to Judge Gottschall; trial preparation; conferences with Mr. McLeod re: above	5.40

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08/26/06	PCM	Conversation with Mr. Durkin re: Joe Dechicio; meeting with Mr. DeMauro and his brother re: trial testimony and status of case	4.50
08/26/06	TJM	Trial preparation; conference with Messrs. DeMauro and McLeod	4.20
08/27/06	TJM	Trial preparation	1.80
08/28/06	PCM	Compare payroll numbers from defendants to lost wages calculation; conversation with Mr. Baker re: Hotsamba v. Caterpillar; conversation with Bernard Harrison re: testifying at trial; draft motion to amend final pretrial order re: attorneys' fees and costs; conferences with Mr. Moran	1.60
08/28/06	TJM	Visit court to check status of Hotsamba/Caterpillar case; conferences with Mr. McLeod; telephone conference with Mr. Hernandez; trial preparation	4.50
08/29/06	PCM	Draft motion to amend final pretrial order; conference with Mr. Moran; conversation with Mr. DeMauro re: Caterpillar case and impact on trial; draft letter to Mr. DeMauro re: postponement of trial; draft letter to Mr. Tolomeo re: subpoena for Waldimar Cruz	1.10
08/29/06	TJM	Review/revise Motion to Amend Pretrial Order; conference with Mr. McLeod re same and re damages claims; continued trial preparation	3.20
08/30/06	PCM	Draft reply in support of motion to limit peremptory challenges; conferences with Mr. Moran	.60
08/30/06	TJM	Trial preparation; telephone mail messages from/to telephone conferences and email correspondence with Messrs. Odeschoo, Hunt and Spataro; conferences with Mr. McLeod	2.20

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08/31/06	PCM	Teleconference with all parties re: rescheduling trial date; conversation with Mr. DeMauro re: trial date; conversation with witnesses (Terracino; Prossnitz; Perry; Kuratko; Dana Kurtz; Tom Durkin) re: change in trial date	1.50
08/31/06	TJM	Telephonic status hearing; prepare for same; telephone conference and office conferences with Mr. McLeod re same	.90
09/01/06	TJM	Complete pending trial preparation tasks; organize file re same	1.50
09/05/06	PCM	Conversations with witnesses regarding change in trial date including Berger, D'Ambrosio, Terracino and Perry; conference with Mr. Moran	.50
09/05/06	TJM	Telephone mail message from Mr. Odeshoo; review email from Mr. Odeshoo and attached court order; conference with Mr. McLeod re same	.50
09/07/06	TJM	Trial preparation	1.50
09/08/06	TJM	Review court order; telephone mail message from and telephone conference with Mr. Boyle	.30
09/12/06	PCM	Draft motion to amend schedule (c) of final pre-trial order to include documents supporting attorneys fees and costs incurred by DeMauro as exhibits; conference with Mr. Moran	.40
09/12/06	TJM	Review/revise Motion to Amend; conference with Mr. McLeod re same and re witness interviews	.50
09/14/06	NMM	Notice, Plaintiff's Mot to Amend Sch C of FPO	.40
09/14/06	TJM	Review letter from Mr. Prossnitz; conference with Mr McLeod re response to same	.50
09/18/06	TJM	Trial preparation	1.20
09/21/06	PCM	Draft motion to amend schedule (c); conference with Mr. Moran	.80

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09/21/06	TJM	Review court order; conference wit Mr. McLeod re court appearance; trial preparation	.80
09/22/06	TJM	Trial preparation	1.80
09/26/06	TJM	Telephone mail messages from/to and telephone conference with Mr. Hunt re Loren-Maltese deposition	.20
09/29/06	TJM	Trial preparation	.70
10/03/06	TJM	Trial preparation	.50
10/05/06	NMM	Issue Subpoena	.40
10/05/06	PCM	Draft trial subpoenas and accompanying letters for 15 witnesses; draft motion to set pretrial conference; draft motion to set pretrial conference; conference with Mr. Moran	5.80
10/05/06	TJM	Conference with Mr. McLeod re trial preparation and motion to set pretrial conference	.50
10/06/06	TJM	Trial preparation; review Judge Gottschall's Law Bulletin notice re her schedule	1.90
10/09/06	PCM	Draft motion and letter to Judge Gottschall re: courtesy copies; draft letter to Mr. DeMauro re: October 30 trial date; review/organize file for trial; conferences with Mr. Moran	2.30
10/09/06	TJM	Trial preparation; work on motion requesting pretrial conference to address unresolved issues; conferences with Mr. McLeod re same	3.50
10/10/06	PCM	Organize pleadings for trial; calculate Mr. DeMauro's lost wages based on defendants' numbers; conversation with Mr. Guido re: dates for testifying at trial; conferences with Mr. Moran	5.80
10/10/06	TJM	Trial preparation; conferences with Mr. McLeod re same and re motion for pretrial conference	3.80

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10/11/06	PCM	Calculate lost wages; draft lost wage charts using Town's numbers and numbers derived from the Collective Bargaining Agreements; review still shots of Betty Loren-Maltese; prepare for hearing on defendant's motion; conversation with Mr. Cruz re: testimony; Amend schedule (c) and (g); review defendants' motion to file response	3.40
10/11/06	TJM	Review Defendants' Response to Motion for Pretrial Conference and Peremptory Challenge Motion; court appearance; telephone mail messages from/to Mr. McLeod; review revised Schedule (c) and (g) and supporting documents; telephone mail message from and telephone conference with Mr. DeMauro	3.80
10/12/06	ARM	Gather case law cited in opponent's brief.	.20
10/13/06	PCM	Review caselaw cited in defendant's response to motion to treat defendants as one party	2.40
10/13/06	TJM	Review/analyze cases cited in Defendants' Response to Peremptory Challenge Motion; telephone mail message to and telephone conferences with Mr. McLeod re arguments to make in Reply; trial preparation	3.80
10/14/06	TJM	Trial preparation	2.20
10/16/06	PCM	Draft reply to defendants' response to motion to treat defendants as one party; conversations with witnesses including: Frank D'Ambrosio, Mike Perry and Karl Berger; conferences with Mr. Moran	6.30
10/16/06	TJM	Conferences with Mr. McLeod re Peremptory Challenge Reply; trial preparation	3.20

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10/17/06	PCM	Conversation with witnesses including: counsel for Joe Decicio, Bernard Harrison and Frank D'Ambrosio; prepare witness list for Judge Gottschall; draft reply brief; review anticipated witness testimony; conference with Mr. Moran	5.20
10/17/06	TJM	Review/revise Peremptory Challenge Motion Reply Brief; trial preparation; conferences with Mr. McLeod	3.80
10/18/06	PCM	Mark deposition designations and objections; draft reply in support of motion to treat defendants as one party; conversation with Legallink re: video editing; conferences with Mr. Moran re: police order not to cooperate	3.30
10/18/06	TJM	Continued trial preparation; final work on Peremptory Challenge Motion Reply Brief; conference with Mr. McLeod re witness communications; defendants' attempt to interfere with same and preparation of motion to address that matter; telephone mail message to Mr. Boyle	3.50
10/19/06	NMM	Deliver Courtesy copy to Judge Gottschall	.40
10/19/06	PCM	Draft letter to Mr. Prossnitz re: subpoena; draft motion to compel; review Luis Guido's deposition; conferences with Mr. Moran	1.90
10/19/06	TJM	Trial preparation; review/revise Motion re Town gag order; review/object re Defendants' Loren-Maltese deposition designations; conferences with Mr. McLeod re all of the above	3.70
10/20/06	NMM	Deliver Courtesy Copy to Judge Gottschall's Chambers	.40

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10/20/06	PCM	Review defendants' deposition designations for Betty Loren-Maltese; prepare deposition summary of Luis Guido; draft letter to Judge Gottschall re: deposition designations; review firm's trial presentation equipment; conferences with Mr. Moran	3.10
10/20/06	TJM	Trial preparation; conferences with Mr. McLeod re same; review letter from Mr. Hunt	3.50
10/21/06	PCM	Trial preparation re: facts we need to prove; conferences with Mr. Moran	2.10
10/21/06	TJM	Trial preparation; conferences with Mr. McLeod re same	3.30
10/22/06	TJM	Trial preparation; telephone mail message to and telephone conference with Mr. McLeod re strategy issue	2.80
10/23/06	MJP	Conference with Mr. Moran re: trial strategy.	.20
10/23/06	PCM	Review rules re: voluntary dismissal; draft adverse examination outline for testimony of Luis Guido; review exhibits; prepare exhibit books; review Loren-Maltese's objection to Plaintiff's request for deposition designation rulings; draft response; conference with Mr. Moran	.40
10/23/06	TJM	Trial preparation; conferences with Mr. McLeod, Mr. Karsh and Mr. Piers re possibly dismissing claims against Ms. Loren-Maltese; review Loren-Maltese objection to video deposition; conferences with Mr. McLeod re same and re trial preparation; telephone mail messages from/to Mr. Odesloo; telephone mail message to Mr. McLeod re same	5.30
10/24/06	PCM	Contact Show It re: rental of Elmo unit and projection equipment; conversations with witnesses re: date of testimony; draft response to defendant's objection; draft letter to Judge Gottschall re: resubmission of deposition	6.60

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designations; trial preparation including review of witness testimony re: exhibits; conversation with Charles Hernandez re: trial testimony; review Contreras deposition re: Graf shooting; conversation with Mr. Prossnitz re: trial testimony; conferences with Mr. Moran

10/24/06	TJM	Review/revise response to Loren-Maltese objection re video deposition; trial preparation; conferences with Mr. McLeod re above	5.70
10/25/06	NMM	Deliver Courtesy Copy to Judge Gottschall's Chambers	.40
10/25/06	PCM	Prepare for examinations of Messrs. Guido, Graf and Berger; conference with Mr. Moran re: same; remark deposition designations of Betty Loren-Maltese; conversation with Mr. DeMauro re: defendants' witnesses	5.20
10/25/06	TJM	Trial preparation; conferences with Mr. McLeod re same; review letters from Mr. Hunt and Mr. Zimmer and enclosed Subpoenas; telephone conference with Messrs. Bailey and McLeod; prepare for 10/26 court appearance; review Loren-Maltese's latest filing re video deposition	7.30
10/26/06	NMM	Deliver Courtesy Copy to Judge Gottschall	.40
10/26/06	PCM	Prepare for motion to compel; draft email to defendants re: Cicero town employee witnesses; contact witnesses re: dates to testify; trial preparation - review witness testimony; prepare letter to Mr. Odeshoo re: witness list and statement of the case; review Judge Gottschall's ruling on motions in limine; draft letter to Mr. Hunt re: subpoena's to undisclosed witnesses; conversation with Mr. Hernandez re: date of testimony and subpoena; review Judge Gottschall's ruling on Loren-Maltese's deposition designations	7.50

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10/27/06 PCM	Meeting with Mr. Hernandez re: trial testimony; trial preparation including equipment check and confirmation; review and update of exhibits and review of deposition transcripts of witnesses; draft letter to Messrs. Hunt and Spataro re: trial subpoenas; telephone conversations with Dana Kurtz re: testimony of Clarence Gross; conferences with Mr. Moran	8.60
10/27/06 TJM	Conference with Messrs. Hernandez and McLeod; telephone mail message from and telephone conference with Mr. Zimmer; telephone mail message from and telephone conference with Mr. Bailey; trial preparation; conferences with Mr. McLeod re all of the above	6.30
10/28/06 PCM	Review testimony of Luis Guido; contact witnesses re: date and time to testify; meeting with Mr. DeMauro re: trial	4.70
10/28/06 TJM	Conference with Messrs. DeMauro and McLeod; trial preparation; review Mr. Hunt's email to Mr. McLeod, Loren-Maltese Motion to Amend Pretrial Order and Defendants' proposed Exhibits 17 and 18	3.80
10/30/06 PCM	Prepare for trial day; meeting with Mr. DeMauro; appearance for trial and meeting with Mr. DeMauro and Mr. Moran following trial day	9.60
10/30/06 TJM	Trial day 1 (jury selection, openings, Guido, Rutka); conferences with Messrs. DeMauro and McLeod before/after same	9.50
10/31/06 PCM	Research re: similarly situated employees/comparators; prepare examinations of Officers Perry and D'Ambrosio; draft response to defendant's motion to allow real time video testimony of Merrick Scott Rayle	8.80

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10/31/06 TJM	Review Loren-Maltese Motion re Rayle; conference with Mr. McLeod re response; review/revise same; conferences with Mr. McLeod re same and re case law/facts re Cruz issue; prepare for 11/1 court appearance; trial preparation	6.80
11/01/06 PCM	Trial preparation including direct examination of Messrs Berger and Graf; hearing with Judge Gottschall re: Rayle deposition designations and Waldemar Cruz testimony; draft letter to Mr. Genden re: Rayle deposition/testimony agreement; trial preparation: contact witnesses, review witness testimony, communication with Ms. Conlon re: Rayle agreement; trial preparation for trial day	12.30
11/01/06 TJM	Court appearance; prepare for same; telephone conference with Mr. Genden; telephone mail messages to Mr. Ficaro and Mr. Kimbarovsky; trial preparation; conferences with Mr. McLeod re all of the above	8.70
11/02/06 PCM	Trial preparation for testimony of Messrs Berger, Perry and D'Ambrosio; appearance for trial: testimony of Merrick Scott Rayle, Betty Loren-Maltese, Charles Hernandez and Karl Berger; meeting with Mr. Moran and Mr. DeMauro before and after court	10.30
11/02/06 TJM	Trial Day 2 (Rayle, Loren-Maltese, Hernandez, Berger, Prossnitz); conferences with Messrs. DeMauro and McLeod before/after same; review Gross Motion to Quash	9.80
11/03/06 ARM	Research and gather 7th Circuit Pattern Jury instructions and Federal Judicial Center criminal jury instructions.	.80

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11/03/06	PCM	Preparation for trial; appearance for trial: testimony of Howard Prossnitz, Clarence Gross, Ron Graf, Cruz, Frank D'Ambrosio and Mike Perry; and jury instruction conference; conferences with Mr. Moran and Mr. DeMauro before/after same	10.90
11/03/06	TJM	Trial Day 3 (Prossnitz, Gross, Graf, Cruz, D'Ambrosio, Perry, jury instruction conference); conferences with Messrs. DeMauro and McLeod before/after same	9.20
11/04/06	PCM	Trial preparation; conference with Mr. Moran and Mr. DeMauro	2.70
11/04/06	TJM	Conference with Messrs. DeMauro and McLeod; otherwise prepare for Trial Day 4	3.40
11/05/06	TJM	Trial preparation	1.70
11/06/06	PCM	Preparation and appearance for trial day: testimony of Bernard Harrison and Messrs. DeMauro Kane and Pikarski; jury instruction conference; draft jury instructions	11.30
11/06/06	TJM	Trial Day 4 (Harrison, DeMauro, McLeod, Kane, Pikarski); jury instruction conference; conference with Mr. McLeod re revising Instructions; prepare for Day 5	11.50
11/07/06	PCM	Prepare calculation and chart of lost wages; preparation for trial; appearance for trial day: testimony of Jim Terracino and Thomas Rowan; closing arguments; and jury instructions	8.30
11/07/06	TJM	Trial Day 5 (Karkula, Rowan); final jury instruction conference; closing arguments; instructions; conference with Mr. DeMauro and Mr. McLeod before/after same	8.50
11/08/06	PCM	Organize trial materials; meeting with Mr. DeMauro and appearance for jury question and verdict	3.10

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11/08/06 TJM	Court appearance re jury question and verdict; conference with jury and defense counsel after same; conferences with Messrs. DeMauro and McLeod before/after same	2.50
11/09/06 TJM	Legal research re reinstatement and related relief; telephone conference with Mr. Roche (FOP) re union consent to reinstatement; review Olszewski Settlement Agreement re retirement date; telephone mail message to Mr. McLeod re Bill of Costs and Rule 59(e) Motion	2.60
11/10/06 PCM	Draft letter to Ms. Boyle re: payment; conversation with Mr. DeMauro re: verdict; review basis for motion to amend or alter judgment	.90
11/10/06 TJM	Conference with Mr. McLeod re post-trial motions and his communication with Mr. DeMauro; telephone conference with Mr. Hernandez re open positions in Cicero Police Dept.; email to Mr. McLeod re same	1.50
11/14/06 PCM	Draft motion to amend judgment and supporting affidavit of John DeLagrange	2.10
11/15/06 JDG	Calculation of prejudgment interest and preparation of spreadsheet exhibit for Court filing.	2.00
11/15/06 PCM	Draft motion to amend/alter judgment; prepare final exhibits	2.80
11/15/06 TJM	Conferences with Mr. Delagrange and Mr. McLeod re prejudgment interest calculation	.30
11/16/06 TJM	Review plaintiff's exhibit 51 to determine and chart monthly payments of fees and other Police Board expenses; conference with Mr. Delagrange re calculating prejudgment interest on same	.70
11/17/06 JDG	Calculation of prejudgment interest and preparation of spreadsheet regarding legal costs paid by Mr. Demauro	1.00

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11/17/06	PCM	Draft motion to amend judgment; conference with Mr. Moran	.50
11/17/06	TJM	Review prejudgment interest calculations; conference with Mr. McLeod re Rule 59(e) Motion	.30
11/20/06	JDG	Calculation of interest and preparation of spreadsheet for lump sum payment on May 17, 1997.	.50
11/20/06	PCM	Research re: prejudgment interest on emotional damages in the 7th Circuit; draft motion to amend judgment; amend calculations in affidavit; conference with Mr. Moran	2.10
11/20/06	TJM	Review/revise draft Rule 59(e) Motion; legal research re availability of prejudgment interest on damages for emotional injuries; conferences with Mr. McLeod re all of the above	2.60
11/21/06	PCM	Draft motion to amend judgment; prepare exhibits and file	1.20
11/21/06	TJM	Continued work on Rule 59(e) Motion; related legal research	1.80
11/27/06	PCM	Draft motion to enter judgment nunc pro tunc; conference with Mr. Moran; draft letter to Ms. Kuemmeth re: court reporting fees	1.10
11/27/06	TJM	Conference with Mr. McLeod re entry of judgment issue; review/revise Motion for Entry of Nunc Pro Tunc Judgment Order	.50
11/28/06	NMM	Plaintiff's Motion to Enter Judgment on the Verdict Nunc Pro Tunc	.40
11/29/06	TJM	Conference with defense counsel and court re entry of judgment and post-trial motions	.30
12/01/06	TJM	Conference with Mr. McLeod re Entry of Judgment and Post Trial Motions	.20
12/05/06	PCM	Review proforma	.90

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12/05/06	TJM	Conferences with Mr. McLeod re getting judgment entered; review/revise billing records; conference with Mr. McLeod re same	.90
12/06/06	TJM	Conference with Mr. McLeod re getting judgment entered; review judgment orders; telephone conference with Mr. DeMauro	.50
12/07/06	TJM	Telephone conferences with Mr. Hernandez re his conversation with Mr. Dominick re Mr. DeMauro's reinstatement; work on post-trial motion (reinstatement issue); legal research re same; conferences with Mr. McLeod re all of the above	1.60
12/11/06	TJM	Review/revise billing records	1.50
12/12/06	TJM	Telephone conference with Mr. McLeod re bill of costs and post-trial motion	.30
12/13/06	PCM	Prepare bill of costs and affidavits	.90
12/13/06	PCM	Prepare bill of costs; review disbursements; review rules and caselaw re: costs; compare costs recoverable to actual costs; draft motion to amend judgment	3.30
12/14/06	TJM	Review/revise settlement agreement	.80
12/15/06	PCM	Draft bill of costs	1.70
12/15/06	TJM	Review/revise post-mail motion and bill of costs	.50
12/18/06	MLS	Deliver courtesy copy to judge	.40
12/18/06	PCM	Review defendants motions to alter or amend judgment and for new trial; re-calculate costs in bill of costs; draft bill of costs; draft motion to alter or amend judgment	5.60
12/18/06	TJM	Final work on post-trial motion sand bill of costs; conference with Mr. McLeod re same; begin review of defendants' post-trial motions	1.20

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12/19/06	PCM	Obtain and review caselaw cited in Defendants' post-trial motions; prepare jury verdict report	3.10
12/19/06	TJM	Complete review/analysis of defendants' post-trial motions and cases cited therein; conference with Mr. McLeod re responses to same	1.30
12/20/06	PCM	Review proforma; draft letter to defendants re: fee conference; conversation with Mr. Miner re: affidavit; draft Miner affidavit; review defendants' cited caselaw re: dismissal of jurors adn intra-corporate conspiracy doctrine	6.30
12/20/06	TJM	Conferences with Mr. McLeod re fee/expense letter to Mr. Spataro and defendants' post-trial motions	.50
12/21/06	PCM	Review file re: appearances; recalculate costs; draft fee conference letter to Mr. Spataro; conference with Mr. Moran	1.10
12/21/06	TJM	Review/revise fee and expense letter to Messrs. Spataro and Zimmer; conferences with Mr. McLeod re same and re responses to defendants' post trial motions	.80
12/26/06	TJM	Work on post-trial motion responses; legal research re jury issue	3.20
12/27/06	TJM	Review letter from Mr. Hunt; review Local Rule 54.3 in light of same; continued legal research re post-trial motion jury issue	2.50
12/28/06	TJM	Review letter from Mr. Spataro; letter to Mr. Spataro in response to same; continued work on post-trial motion responses; letter to Mr. Hunt	2.60
12/29/06	TJM	Review letter from Mr. Spataro; draft letter response to same; continued work on pretrial motion responses	1.90
01/02/07	PCM	Review correspondence re: fee conference; draft letter to Mr. Spataro re: fee conference; draft jury verdict report	1.10

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01/02/07 TJM	Continued work on post-trial motion responses; conferences with Mr. McLeod re same and re recent developments	2.80
01/02/07 TJM	Continued work on post-trial motion responses; review letter from Mr. Hunt re fee records; prepare for 1/10 Local Rule 54.3(d) meeting with Messrs. Spataro and Zimmer; telephone mail messages from and telephone conference with Ms. Spataro's assistant re same	5.80
01/03/07 PCM	Review voir dire and testimony of Betty Loren-Maltese re: when she was last elected	.80
01/03/07 TJM	Continued work on post-trial motion responses; conferences with Mr. McLeod re same	4.80
01/04/07 TJM	Continued work on post-trial motion responses; conference with Mr. McLeod re same	2.30
01/05/07 TJM	Continued work on post-trial motion responses	2.20
01/06/07 TJM	Continued work on post-trial motion responses	2.30
01/08/07 AEC	Consult with P. McLeod re organization of transcripts from court proceedings	.30
01/08/07 PCM	Review defendants' post-trial motions; conference with Ms. Cisneros re: transcript; conference with Mr. Moran re: response	1.40
01/08/07 TJM	Continued work on post-trial motion responses; conferences with Mr. McLeod re same	4.80
01/09/07 AEC	Print transcripts of court proceedings	1.40
01/10/07 AEC	Organize transcripts of court proceedings	2.20
01/10/07 TJM	L.R. 54(3) Conference re fees/expenses with Messrs. Spataro and Zimmer; prepare for same; letter to Messrs. Spataro and Zimmer re same; continued work on post-trial motion responses	4.50

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01/11/07 AEC	Organize and label binders of transcripts from court proceedings	4.10
01/11/07 TJM	Continued work on post-trial motion responses	4.70
01/12/07 TJM	Continued work on post-trial motion responses	1.80
01/15/07 PCM	Draft response to post-trial motions	1.20
01/15/07 TJM	Conference with Mr. McLeod re 1/10 conference with Messrs. Spataro and Zimmer and re Post-Trial Motion responses; continued work on responses; review letter from Mr. Spataro; prepare response to same; review defendants' Motion to Compel; conference with Mr. McLeod re same	3.80
01/16/07 AEC	Research article for P. McLeod re waivers in federal courts	1.30
01/16/07 PCM	Draft response to Defendant's motion to compel billing records; conference with Mr. Moran re: response to post-trial motions; draft response re: evidence of arrest and witnesses	7.60
01/16/07 TJM	Revise letter to Mr. Spataro re fee issues; conference with Mr. McLeod re response to defendants' Motion to Compel Production of Hernandez Records; re/revise same; continued work on post Trial Motion responses; conferences with Mr. McLeod re same	5.30
01/17/07 AEC	Retrieve article re waivers in federal court from Cook County Law Library; make copy for P. McLeod	.90
01/17/07 PCM	Draft responses to renewed motions for judgment as a matter of law; continue drafting response to post-trial motions for new trial and to alter/amend judgment	8.20

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01/17/07 TJM	Continued work on Post-Trial Motion responses; related legal research; prepare for 1/18 court appearance; conferences with Mr. McLeod re all of the above	5.60
01/18/07 PCM	Appearance for motion to compel; continue to draft responses to renewed motions for judgment and post-trial motions for new trial and to alter/amend judgment	7.30
01/18/07 TJM	Court appearance; conference with Mr. McLeod re same and re compiling Hernandez billing records; continued work on post-trial motion responses; conferences with Mr. McLeod re same; review defendants' objections to Bill of Costs and Response to Motion to Alter/Amend Judgment	7.50
01/19/07 NMM	Courtesy Copy to Judge Gottshall	.40
01/19/07 NMM	Deliver Courtesy Copy to Judge Gottschall's Chambers	.40
01/19/07 TJM	Telephone mail message from Mr. DeMauro; telephone conference with Messrs. DeMauro and McLeod re defendants' post-trial motion responses; telephone conference with Mr. Hernandez re same; begin work on post-trial motion replies	3.70
01/22/07 TJM	Continued work on post-trial motions replies	1.20
01/23/07 PCM	Meeting with Mr. Hernandez; draft affidavit re: his knowledge of Mr. DeMauro's performance while employed by the Town of Cicero; review Agenda for Town of Cicero Board of Trustees meetings re: hiring of new police officers	2.70
01/23/07 TJM	Conference with Messrs. Hernandez and McLeod re: Hernandez affidavit; conferences with Mr. McLeod re: same; review Tribune article re: newly hired patrol officers; draft motion to strike objections to bill of costs; continued work on post-trial motion replies	3.60

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01/24/07	PCM	Draft affidavit of Mr. Hernandez; review defendant's cited cases; meeting with Messrs. Hernandez and Moran re: affidavit	2.40
01/24/07	TJM	Telephone conference with Mr. Hernandez re: his affidavit; revise affidavit in light of same; conferences with Messrs. Hernandez and McLeod to finalize Hernandez affidavit; revise motion to strike objections to bill of costs; related legal research; continued work on post-trial motion replies	4.80
01/25/07	TJM	Continued work on post-trial motion replies	3.40
01/26/07	TJM	Review letter from Mr. Zimmer and billing records of Hunt and Delgado firms; continued work on post-trial motion replies	2.80
01/29/07	PCM	Draft reply brief; calculate billable hours for periods of 5/4/06 - 11/8/06 and 5/18/05 - 11/8/06; review Town's reply	2.10
01/29/07	TJM	Complete work on post-trial motion reply; review Giglio/Delgado and Hunt billing records and calculate their fees and expenses; review Town reply and Loren-Maltese motion for additional time; conferences with Mr. McLeod re: all of the above	7.30
01/30/07	NMM	Deliver Courtesy Copy to Judge Gottschall	.40
01/30/07	TJM	Conferences with Mr. McLeod re his telephone conferences with Mr. Hunt; review letter from Mr. Hunt and Mr. Hunt's letter to Judge Gottschall; conference with Mr. McLeod re same; begin review/ analysis of prior defense counsel billing records	1.30
01/31/07	TJM	Complete review/analysis of defense firms billing records and calculate totals	1.80

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Fee Summary

ARIANNA CISNEROS	10.20 hours at \$ 65.00 =	663.00
ALLISON MARGOLIES	1.20 hours at \$ 205.00 =	246.00
AARON BROWN	2.00 hours at \$ 65.00 =	130.00
ALEX MONTGOMERY	5.70 hours at \$ 190.00 =	1083.00
CHRISTINA JACKIW	0.70 hours at \$ 65.00 =	45.50
JULIET BERGER-WHITE	6.70 hours at \$ 220.00 =	1474.00
John DelaGrange	3.50 hours at \$ 65.00 =	227.50
MATTHEW J. PIERS	1.90 hours at \$ 400.00 =	760.00
MARCI SAHINOGLU	0.40 hours at \$ 65.00 =	26.00
MACK FISHER	0.40 hours at \$ 65.00 =	26.00
MATHEW MONTALVO	4.80 hours at \$ 65.00 =	312.00
PETER MCLEOD	442.90 hours at \$ 190.00 =	84151.00
TERENCE J. MORAN	897.90 hours at \$ 360.00 =	323244.00

Fees Billed.: 412388.00

Disbursements.:

12/28/98	Messenger Service to 55 W. Wacker	1.00
04/10/00	Messenger Service to 50 W. Washington	4.40
11/03/00	Messenger Service to 3-First National Plaza	7.10
01/29/02	Messenger Service to Cahill Christian, 224 S Michigan, Chicago, IL	5.10
05/19/03	Messenger delivery service to Wildman & Harrold, 225 W Wacker, Chicago, IL	5.10
05/19/03	Messenger delivery service to Ungaretti, 70 W Madison, Chicago, IL	5.10
05/19/03	Messenger delivery service to Torshen Sprayer, 105 W Adams, Chicago, IL	5.10
05/22/03	Messenger delivery service to Torshen Sprayer, 105 W Adams, Chicago, IL	7.10
05/22/03	Messenger delivery service to Wildman & Harrold, 225 W Wacker, Chicago, IL	7.10
10/14/03	Meal expense re: deposition on 10/14/03	11.19
11/10/03	Fee for copy of deposition transcript re: Joseph DeMauro, taken on 10/14/03	567.10
08/12/04	Deposition transcript and attendance fee re: Louis Guido, taken on 7/20/04	309.85

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09/07/04	1/2 Travel expenses for out of town deponent re: Merrick Scott Rayle	239.83
09/10/04	Deposition transcript and attendance fee re: Merrick Rayle, taken on 08/27/04	639.10
10/22/04	Deposition transcript and attendance fee re: W. Bacon, taken on 10-4-04	269.62
05/10/05	Travel, hotel accomodations and meal expense re: Loren-Maltese deposition	922.60
05/23/05	Fee for copy of deposition transcript re: Betty Loren-Maltese, taken on 05/11/05	1218.60
06/03/05	Deposition transcript and attendance fee re: Betty Lore-Maltese, taken on 05/11/05	723.25
05/31/06	Messenger delivery service from IL Fraternal Order of Police, 5600 Wolf Rd., Western Springs, IL	39.10
06/01/06	Messenger delivery service to Giglio & Delgado, Westchester, IL	24.05
08/11/06	Trial subpoena fee re: Karl Berger	47.50
08/11/06	Trial subpoena fee re: Charles Hernandez	47.50
08/11/06	Trial subpoena fee re: Clarence Gross	47.50
08/11/06	Reversal from Void Check Number: 69974 Bank ID: MERRILL Voucher ID: 63566 Vendor: CHARLES HERNANDEZ	(47.50)
08/11/06	Trial subpoena re: Luis Guido	47.50
08/11/06	Trial subpoena fee re: Joe Dechicio	47.50
08/15/06	Witness and mileage fee re: Paul DeMauro	47.50
08/15/06	Reversal from Void Check Number: 70045 Bank ID: MERRILL Voucher ID: 63603 Vendor: PAUL DeMAURO	(47.50)
08/15/06	Witness and mileage fee re: Frank D' Ambrosio	47.50
08/15/06	Witness and mileage fee re: Mike Perry	47.50
08/15/06	Witness and mileage fee re: Bernard Harrison	47.50
08/15/06	Witness and mileage fee re: James Terracino	47.50
08/15/06	Witness and mileage fee re: Howard Prossnitz	47.50
08/15/06	Witness and mileage fee re: Ronf Graf	47.50
08/16/06	Overnight delivery service to Joe tolmeo, I-Trace, Ltd., Palatine IL	15.08
08/23/06	Messenger delivery service to Palatine, IL	86.35
08/26/06	Parking for meeting with Mr. DeMauro	6.00
08/28/06	Witness and mileage fee re: Waldimir Cruz	47.50
08/28/06	Witness and mileage fee re: Armando Galvin	47.50
08/28/06	Reversal from Void Check Number: 70115 Bank ID: MERRILL Voucher ID: 63678 Vendor: FRANK KANE	(47.50)
08/28/06	Witness and mileage fee re: Frank Kane	47.50

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08/28/06	Reversal from Void Check Number: 70114 Bank ID: MERRILL Voucher ID: 63677 Vendor: ARMANDO GALVIN	(47.50)
08/29/06	Overnight delivery service to Joe Tolomeo, I-Trace Ltd., Palatine, IL	15.08
08/30/06	Fee for 10 page fax from Athens, Greece to HSP (Demand Draft Pleading)	50.00
09/03/06	Process Servers fee re: attempted service/service of subpoenas and locate reports of various individuals	1157.95
10/31/06	Messenger delivery service to 5801 N. Sheridan Rd.	19.75
10/31/06	Outside copy expenses re: duplicating and tabbing of documents	292.80
10/31/06	Messenger delivery service to 1130 S. Michigan Ave	8.10
11/03/06	Meals during trial	98.29
11/08/06	Fee for actors at trial	290.00
11/27/06	Court reporting fees	767.70
12/06/06	Fee for trial transcript	776.88
01/17/07	Trial transcript fee	544.50
01/31/07	Westlaw on-line research fee	468.35
12/31/98	Monthly Office Photocopy Expense	80.60
03/31/99	Monthly Office Photocopy Expense	63.20
03/31/99	Monthly Fax Expense	8.00
03/31/99	Monthly Postal Expense	8.14
12/31/99	Monthly Office Photocopy Expense	3.00
01/31/00	Monthly Fax Expense	7.00
01/31/00	Monthly Postal Expense	.33
04/30/00	Monthly Office Photocopy Expense	14.60
04/30/00	Monthly Fax Expense	3.00
04/30/00	Monthly Postal Expense	.66
07/31/00	Monthly Office Photocopy Expense	13.60
09/30/00	Monthly Fax Expense	1.50
09/30/00	Monthly Postal Expense	.66
11/30/00	Monthly Office Photocopy Expense	31.00
11/30/00	Monthly Postal Expense	2.42
12/31/00	Monthly Office Photocopy Expense	5.60
03/31/01	Monthly Office Photocopy Expense	9.60
07/31/01	Monthly Office Photocopy Expense	5.40
09/30/01	Monthly Office Photocopy Expense	.60
11/30/01	Monthly Office Photocopy Expense	7.60
01/31/02	Monthly Office Photocopy Expense	54.00
02/28/02	Monthly Postal Expense	1.03
07/31/02	Monthly Fax Expense	1.00

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11/30/02 Monthly Office Photocopy Expense	.40
11/30/02 Monthly Fax Expense	3.00
11/30/02 Monthly Postal Expense	.37
01/31/03 Monthly Fax Expense	3.00
02/28/03 Monthly Postal Expense	7.60
05/31/03 Monthly Fax Expense	2.00
10/31/03 Monthly Office Photocopy Expense	3.60
10/31/03 Monthly Fax Expense	1.50
10/31/03 Monthly Postal Expense	1.48
01/31/04 Monthly Office Photocopy Expense	1.20
01/31/04 Monthly Postal Expense	1.11
02/29/04 Monthly Fax Expense	1.50
06/30/04 Monthly Fax Expense	1.00
06/30/04 Monthly Long Distance Telephone Expense	.50
06/30/04 Monthly Postal Expense	1.11
07/31/04 Monthly Office Photocopy Expense	21.00
08/31/04 Monthly Office Photocopy Expense	.80
09/30/04 Monthly Postal Expense	.37
11/30/04 Monthly Office Photocopy Expense	4.60
12/31/04 Monthly Office Photocopy Expense	7.20
01/31/05 Monthly Postal Expense	.60
03/31/05 Monthly Office Photocopy Expense	16.00
03/31/05 Monthly Fax Expense	2.00
03/31/05 Monthly Long Distance Telephone Expense	.45
03/31/05 Monthly Postal Expense	.37
04/30/05 Monthly Office Photocopy Expense	8.60
04/30/05 Monthly Long Distance Telephone Expense	.95
05/31/05 Monthly Long Distance Telephone Expense	.30
06/30/05 Monthly Postal Expense	.37
08/31/05 Monthly Fax Expense	1.50
09/30/05 Monthly Office Photocopy Expense	6.00
01/31/06 Monthly Office Photocopy Expense	17.00
02/28/06 Monthly Office Photocopy Expense	142.20
02/28/06 Monthly Long Distance Telephone Expense	.15
03/31/06 Monthly Office Photocopy Expense	135.80
03/31/06 Monthly Fax Expense	9.00
05/31/06 Monthly Office Photocopy Expense	178.20
06/30/06 Monthly Office Photocopy Expense	306.40
06/30/06 Monthly Fax Expense	5.00
06/30/06 Monthly Long Distance Telephone Expense	61.88
07/31/06 Monthly Office Photocopy Expense	75.60
07/31/06 Monthly Postal Expense	8.35
08/31/06 Monthly Office Photocopy Expense	22.40
08/31/06 Monthly Fax Expense	7.50
08/31/06 Monthly Long Distance Telephone Expense	.30

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08/31/06 Monthly Postal Expense	5.81
10/31/06 Monthly Office Photocopy Expense	782.00
10/31/06 Monthly Fax Expense	23.50
10/31/06 Monthly Postal Expense	6.24
11/30/06 Monthly Office Photocopy Expense	289.80
11/30/06 Monthly Postal Expense	.78
12/31/06 Monthly Fax Expense	1.50
12/31/06 Monthly Postal Expense	4.44
01/31/07 Monthly Office Photocopy Expense	85.60
01/31/07 Monthly Fax Expense	2.50
Total Disbursements.:	<u>12725.69</u>
Total Current Bill.:	<u>425113.69</u>
Balance Due.:	425113.69
Retainer to be applied:	.00
Total Due.:	425113.69

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following application of the
disbursement described above

Note: Unless we receive an objection,
the retainer will be transferred after the
ten (10) day period described in the
attached letter from our firm.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

JOSEPH DEMAURO,)	
)	
Plaintiff,)	
)	
v.)	No. 98 C 8318
)	Judge Gottschall
BETTY LOREN-MALTESE; TOWN OF CICERO;)	
LOUIS GUIDO; MERRICK SCOTT RAYLE;)	
LEONARD RUTKA; and TOWN OF CICERO)	
BOARD OF FIRE, POLICE AND PUBLIC SAFETY)	
COMMISSIONERS,)	
)	
Defendants.)	

AFFIDAVIT OF TERENCE J. MORAN

I, Terence J. Moran, state under oath that the following facts are true:

1. I received a Bachelor of Arts degree from the University of Illinois at Champaign-Urbana in 1976. In 1983, I received a Juris Doctor degree, *cum laude*, from Loyola University of Chicago School of Law. I was ranked second in a law school class of approximately 150, received the John D. McCormick and John C. Hayes scholarship awards, and was a member and student articles editor of the Law Journal.

2. I was admitted to the bars of the Illinois Supreme Court and the United States District Court for the Northern District of Illinois in 1983. In 1986, I was admitted to the bar of the United States Court of Appeals for the Seventh Circuit, as well as to the trial bar of the United States District Court for the Northern District of Illinois.

3. From 1983 through 1986, I was employed as an Associate Attorney in the Litigation Division of the law firm of Schiff, Hardin & Waite, where my practice included civil rights and

employment litigation, as well as other complex litigation matters. During that time, among other trials in which I was involved, I participated as plaintiff's counsel in the trial of *Thomson v. DeRobertis*, No. 81 C 1279 (N.D. Ill.), a bench trial before Judge Shadur, and in the trial of *Rodriguez v. Schweiger*, No. 78 C 2295 (N.D. Ill.), a jury trial before Judge Moran.

4. In January of 1987, Schiff, Hardin & Waite assigned me to work in the City of Chicago Department of Law pursuant to the "lend a lawyer" program initiated by then Corporation Counsel Judson H. Miner. In that capacity, I represented the City and City officials in a variety of complex matters, mostly civil rights cases, many of which went to trial. In October of 1987, I decided not to return to Schiff, Hardin & Waite and joined the City Law Department as an Assistant Corporation Counsel, in which capacity I continued to represent the City and City officials in civil rights cases and other complex litigation matters. In the summer of 1989, I was promoted to the position of Chief Assistant Corporation Counsel in the Labor Division of the City Law Department. In that capacity, I supervised approximately 20 other attorneys and was in charge of all federal and state court litigation arising out of employment law claims asserted against the City of Chicago and its officials and supervisory employees.

5. During my tenure with the City of Chicago Department of Law, I was lead trial counsel in numerous cases tried in the United States District Court for the Northern District of Illinois, and in the Circuit Court of Cook County. Some of the more notable cases tried in federal court include: (1) *Auriemma v. Rice*, No. 84 C 1224 (N.D. Ill.), a jury trial before Judge Holderman involving "reverse" race discrimination claims by twelve former management-level police officials, against the City's first African-American Superintendent of Police; (2) *Mann v. City of Chicago*, No. 84 C 11020 (N.D. Ill.), a jury trial before Judge Lindberg involving political and sex discrimination and other claims, by a discharged Assistant Corporation Counsel against the Corporation Counsel

and two supervisory attorneys in the City Law Department; (3) *Fogarty v. Greenwood*, No. 84 C 10613 (N.D. Ill.), a jury trial before Judge Shadur involving excessive force and false arrest claims against four Chicago police officers; (4) *Salazar v. City of Chicago*, No. 84 C 10156 (N.D. Ill.), a jury trial before Judge Zagel arising from the death of a prisoner in a Chicago Police Department lockup; and (5) *Chicago Tribune Corp. v. City of Chicago*, No. 87 C 5126 (N.D. Ill.), a bench trial before Magistrate Judge Weisberg arising from the City's policy to prohibit or regulate the placement of newspaper vending boxes in the terminals and concourses of O'Hare International Airport.

6. From August of 1984 through May of 1989, I was a part-time Legal Writing/Moot Court Instructor at Loyola University School of Law. During the Spring semesters from February of 1990, through May of 1995, I was an adjunct Trial Advocacy Instructor at that Law School and was named a Senior Lecturer in Law. I ceased my teaching activities after 1995, when my daughter was diagnosed with autism, so as to be able to devote more time to her and to her brother.

7. Since January of 1994, I have been a partner/shareholder in the law firm of Hughes, Socol, Piers, Resnick & Dym, Ltd., where my practice has consisted primarily of employment, civil rights and commercial litigation and counseling. In the employment and civil rights areas, I have represented and counseled both employees and employers, and both plaintiffs and defendants. My practice involves a mix of hourly billed clients, percentage contingent fee arrangements and statutory fee shifting cases. My current standard billing rate on hourly and statutory fee shifting cases is \$360, although I sometimes discount my hourly rate for individual hourly-billed clients depending on their financial resources and the relative complexity of the matter in question.

8. On August 31, 2001, Judge Elaine E. Bucklo awarded compensation under 42 U.S.C. § 1988 at the hourly rate of \$300 for my time in *Niebur v. Bue*, No. 98 C 4157 (N.D. Ill.).

9. Judge Bucklo also at that time awarded compensation under 42 U.S.C. § 1988 at the hourly rate of \$300 for my then-partner, Jonathan A. Rothstein; at \$275 an hour for my then partner Frederick S. Rhine; and at \$85 per hour for paralegal Christina Jackiw.

10. On March 20, 2006, Judge Rebecca Pallmeyer awarded compensation under 42 U.S.C. § 1988 at the hourly rate of \$350 for my time and \$335 for my then partner Frederick Rhine in *Wade v. Thomas*, No. 05 C 3901 (N.D. Ill.).

11. Peter C. McLeod has been employed as an Associate Attorney for our law firm since September 2002 to the present, during which time he has worked on approximately four civil rights cases. Mr. McLeod earned a Bachelor of Arts degree from Purdue University in 1992, a Masters of Arts degree from George Washington University in 1997 and a Juris Doctor degree from Chicago-Kent College of Law in 2002. Mr. McLeod has served as second chair at trial in four other cases. Mr. McLeod was admitted to this district court's trial bar in December of 2006. I believe that the \$190 hourly fee charged for Mr. McLeod's work on this case is reasonable and consistent with market rates for attorneys with similar qualifications and experience.

12. Juliet Berger-White has been employed by our law firm since October of 2001 and was made a partner effective January 1, 2007. Her practice focuses on the areas of civil rights and employment litigation. Prior to joining our firm, Ms. Berger-White served as a law clerk to Chief Justice Barbara B. Crabb of the United States District Court for the Western District of Wisconsin. Ms. Berger-White received a Bachelor of Science degree, with distinction, from the University of Wisconsin at Madison in 1995, and a Juris Doctor degree, *cum laude*, from Northwestern University School of Law in 1999. She also was an editor of *Northwestern University Law Review*. I believe the \$220 hourly fee charged for Ms. Berger-White's work on this case is reasonable and consistent with market rates for attorneys with similar qualifications and experience.

13. Alex Montgomery was employed as an Associate Attorney at our firm from November 29, 2004 through March 9, 2007, focusing primarily on civil rights, employment and insurance coverage litigation. She graduated *cum laude* from Williams College in 1996 and received a Juris Doctor degree from the University of Chicago Law School in 2002. While at the University of Chicago, Ms. Montgomery founded the Public Interest Law Society. I believe the \$190 hourly fee charged for Ms. Montgomery's work on this case is reasonable and consistent with market rates for attorneys with similar qualifications and experience.

14. Matthew J. Piers is a shareholder of our firm, where he has practiced since 1989. From 1984 to 1989, he served as Deputy Corporation Counsel in charge of all litigation matters for the City of Chicago Law Department. Mr. Piers is a nationally recognized trial attorney and civil rights lawyer. After attending Cornell University for three years, Mr. Piers was admitted to the University of Chicago Law School, where he received his Juris Doctor degree in 1974. He has received numerous honors and awards for his civil rights legal work and is a Fellow of the American College of Trial Lawyers. I believe the \$400 hourly fee for his work on this case is reasonable and consistent with market rates for attorneys with similar qualifications and experience.

15. Alison J. Margolies was employed as an Associate Attorney at our law firm from November 11, 2002 until December 15, 2006. Her practice focused on civil rights, employment and commercial litigation. Ms. Margolies received a Bachelor of Arts degree from the University of Pennsylvania in 1993 and a Juris Doctor degree, with honors, from George Washington University in 2000. Prior to joining our law firm, Ms. Margolies was a law clerk in the United States District Court for the District of New Jersey and worked as an Associate Attorney at Sonnenschein, Nath & Rosenthal, LLP. I believe the \$205 hourly fee for her work on this case is reasonable and consistent with market rates for attorneys with similar qualifications and experience.

16. John L. DeLaGrange is our firm's Firm Administrator. He was a practicing Certified Public Accountant from 1965 to 1969 and worked at various banking institutions as a Manager, Treasurer, CFO, President and CEO from 1969 through 1991. I believe the \$65 hourly fee charged for his work on this case, preparing a calculation of prejudgment interest on the categories of damages awarded to Plaintiff, is reasonable, indeed far less than market rates for accountants with similar qualifications and experience.

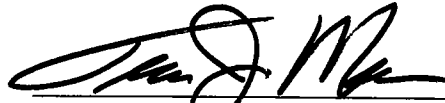
17. Arianna Cisneros, Matthew Montalvo, Aaron Brown, Christina Jackiw, Marci Sahinoglu and Mack Fisher are or have been employed by our law firm as paralegal assistants and docket clerks. I believe the \$65 hourly fee charged for their work on this case is reasonable and similar to what other law firms in this market charge for such services.

18. Our law firm's time and expense records for this case which are submitted in support of this fee motion accurately document the time spent, tasks performed and disbursements made in connection with this case. I and the other attorneys who performed legal services in this case, as with every case, were required by the firm to make contemporaneous and accurate entries of our time in this litigation, as were the non-lawyer employees who performed services in connection with this case. Those time entries were compiled in our law firm's computerized records that are maintained for this case.

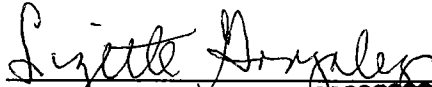
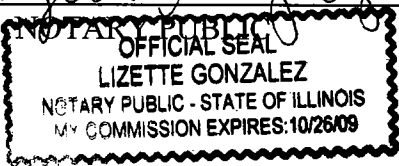
19. During the pendency of this case and the related *Hernandez* case, I was always sensitive to the fact that occasionally time was spent which advanced both cases. This primarily occurred in connection with court appearances and the depositions of some, but not all, Town officials. Where that was the case, I divided the time spent between the two cases in the manner I believed was fairest under the circumstances. For most court appearances, where the number of plaintiffs in each case was irrelevant to the issues before the Court, I would divide the time evenly.

On other occasions, I would recognize the time spent on each case was affected by the number of plaintiffs involved. For example, the last settlement conference in this case, with Magistrate Judge Keys, involved Joseph DeMauro and two *Hernandez* plaintiffs. I therefore assigned two-thirds of my time spent on these cases that day to *Hernandez* and one-third of my time to this case.

FURTHER AFFIANT SAYETH NOT.


Terence J. Moran

Subscribed and sworn to before
me this 12th day of March, 2007.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

JOSEPH DEMAURO,)	
)	
Plaintiff,)	
)	
v.)	No. 98 C 8318
)	Judge Gottschall
BETTY LOREN-MALTESE; TOWN OF CICERO;)	
LOUIS GUIDO; MERRICK SCOTT RAYLE;)	
LEONARD RUTKA; and TOWN OF CICERO)	
BOARD OF FIRE, POLICE AND PUBLIC SAFETY)	
COMMISSIONERS,)	
)	
Defendants.)	

AFFIDAVIT OF JUDSON H. MINER

Judson H. Miner, being first duly sworn, deposes and states:

1. I am a 1967 graduate of the University of Chicago Law School. After a one year clerkship for Judge Simon Sobeloff, U.S. Court of Appeals for the Fourth Circuit, I was admitted to practice in Illinois in 1968 and have practiced in Chicago since that time.

2. From 1970 to March, 1986 and again from September, 1989 to the present, I have been a partner at Miner, Barnhill & Galland, P.C. (formerly Davis, Miner, Barnhill & Galland, P.C.). From February, 1986 to May, 1989 I was the Corporation Counsel of the City of Chicago. My career is accurately summarized in the resume attached as Attachment 1 to this Affidavit.

3. During the 30 years I have been in private practice, my practice has concentrated in the area of federal civil rights and other class action litigation. I have personally handled a large number of civil rights lawsuits under 42 U.S.C. § 1983, Title VII of the Civil Rights Act of 1964, and the Voting Rights Act of 1965, as well as other cases involving issues of constitutional law.

4. During the time I was Corporation Counsel for the City of Chicago, one of my

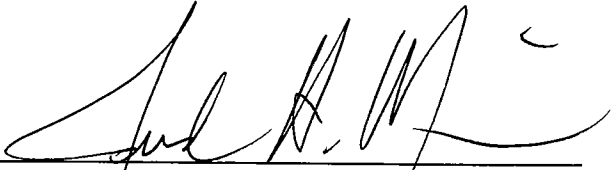
responsibilities was the overall supervision of all hiring of private litigation counsel to represent the City. On many occasions, I reviewed the work performed by outside litigation counsel for the City and approved for payment the bills submitted by them. I also reviewed attorneys' fees petitions filed by plaintiffs against the City of Chicago in civil rights cases. As a result, I became extremely familiar with the rates charged by various Chicago law firms for representation in civil litigation.

5. Since leaving my position as Corporation Counsel, I have had occasion to prepare fee petitions in at least six cases. In order to prepare these petitions, I again familiarized myself with various rates charged by attorneys in civil litigation practice in the Chicago area.

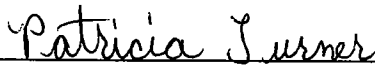
6. I am submitting this Affidavit at the request of Mr. Terence J. Moran of Hughes, Socol, Piers, Resnick & Dym, Ltd..

7. I have known Mr. Moran since January of 1987, when Schiff, Hardin & Waite, at which Mr. Moran was an associate, assigned him to work in the City of Chicago Law Department (of which I was the Corporation Counsel) pursuant to a "lend a lawyer" program. He was an active litigator while I was Corporation Counsel, and I was familiar with much of his work. Mr. Moran is an outstanding attorney. I have followed Mr. Moran's career since he left the City of Chicago Law Department, and I know that he continues to do outstanding legal work, and that he has an excellent reputation among attorneys.

8. Based on my experience as Corporation Counsel, my general knowledge of hourly rates charged by my firm and others in the Chicago area, and my knowledge of the abilities of Mr. Moran, the hourly rate of \$360.00 for Mr. Moran is very reasonable and well within the prevailing rates charged in the Chicago legal community for such an experienced and qualified attorney.


Judson H. Miner, Esq.

SUBSCRIBED AND SWORN TO
before me this 12th day
of March 2007.


Notary Public

